EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

PERSONALWEB TECHNOLOGIES, LLC. AND LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs.

v.

RACKSPACE US, INC., ET AL.,

Defendants.

PERSONALWEB TECHNOLOGIES, LLC. AND LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION.

Defendant.

Civil Action No. 6:12-cv-00659-JRG

JURY TRIAL DEMANDED

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JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

In accordance with Patent Rule 4-3, the parties hereby submit their Joint Claim Construction and Prehearing Statement for the constructions of terms, phrases, and clauses for U.S. Patent Nos. 6,415,280 ("the '280 patent"), 6,928,442 ("the '442 patent"), 7,802,310 ("the '310 patent), and 8,099,420 ("the '420 patent), (collectively "the asserted patents"). In accordance with Patent Rule 4-2(c), the parties met and conferred for the purposes of narrowing the issues and finalizing preparation of a Joint Claim Construction and Prehearing Statement.

A. Agreed-Upon Constructions

Exhibit A provides the construction of those claim terms, phrases, or clauses on which the parties agree.



B. Disputed Claim Constructions

Exhibit B identifies the disputed claim terms and provides PersonalWeb's and Defendants' respective proposed constructions and an identification of intrinsic and extrinsic evidence supporting their proposed constructions, as required by P.R. 4-3(b).

C. Anticipated Length of Time for the Claim Construction Hearing

The Parties propose that each side be allotted ninety minutes of argument time.

D. Identification of Witnesses

The Parties do not intend to offer the oral or written testimony of any witnesses, including experts, at the Claim Construction Hearing.



Dated: November 18, 2015

Respectfully submitted,

/s/ Brent P. Ray

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