

EXHIBIT A

EXHIBIT A – COMPARISON OF ACCELERATION BAY’S PROPOSED CLAIM CONSTRUCTION

No.¹	Terms for Construction	Plaintiff's Proposed Constructions in the Joint Claim Construction Chart	Plaintiff's Proposed Construction in the Joint Claim Construction Brief of Nenad Medvidović
17.	“m-regular” “m-regular network”	a network where each participant has m neighbor participants in a steady state	a network where each participant has m neighbor participants in a steady state
16.	“m”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
18.	“m-connected” “m-connected network”	a network that may be divided into disconnected sub-networks by the removal of m participants in a steady state	a network that may be divided into disconnected sub-networks by the removal of m participants in a steady state
9.	“computer network”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
10.	“network”	plain and ordinary meaning	plain and ordinary meaning

¹ The numbering for the terms corresponds with the numbering in the filed Joint Claim Construction Chart (D.I. 1). The terms are listed in the order they appeared in the Declaration of Nenad Medvidović (Ex. 13 to Defendants’ Motion for Summary Judgment). The Joint Claim Construction Chart does not include the means-plus-function terms for which there is no dispute, or claims 26 and 28 in the Joint Claim Construction Chart that Acceleration Bay did not address in its briefing. For claim 27 in the JCCC, “computer readable medium,” in its Construction Brief, Acceleration Bay maintained its position in the JCCC of “No construction necessary: plain and ordinary meaning.” Acceleration Bay also argued that the Court should only partially adopt Defendants’ proposed construction.

No. ¹	Terms for Construction	Plaintiff's Proposed Constructions in the Joint Claim Construction Chart	Plaintiff's Proposed Construction of the Claim Construction Br of Nenad Medvidović
11.	"computer"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
12.	"a plurality of participants"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
13.	"participant" "participants"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
14.	"connection" "connections" "connected" "connect" "connecting" "interconnections" "disconnecting"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
15.	"neighbor" "neighbors" "neighboring"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
19.	"thus resulting in a non-complete graph" "the network forms an incomplete graph"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning

No. ¹	Terms for Construction	Plaintiff's Proposed Constructions in the Joint Claim Construction Chart	Plaintiff's Proposed Construction of Claim Construction Br of Nenad Medvidović
20.	"data"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
21.	"peers" "peer-to-peer connections"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
22.	"broadcast channel" "broadcast channels"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
23.	"A non-routing table based computer network having a plurality of participants"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
24.	"A non-routing table based computer-readable medium containing instructions for controlling communications of a participant of a broadcast channel within a network"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
25.	"A computer-based, non-routing table based, non-switch based method for adding a participant to a network of participants"	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning

No. ¹	Terms for Construction	Plaintiff's Proposed Constructions in the Joint Claim Construction Chart	Plaintiff's Proposed Construction of Claim Construction Br of Nenad Medvidović
29.	“fully connected portal computer” “located portal computer”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
30.	“each participant being connected to three or more other participants”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
31.	“sends an edge connection request to a number of randomly selected neighboring participants to which the seeking participant is to connect”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
32.	“connection port search message”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
33.	“in order to maintain an m-regular graph”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning
34.	“list of neighbors”	No construction necessary: plain and ordinary meaning	No construction necessary: plain and ordinary meaning

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