IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

VERSATA SOFTWARE, INC., F/K/A TRILOGY SOFTWARE, INC.; and VERSATA DEVELOPMENT GROUP, INC., F/K/A TRILOGY DEVELOPMENT GROUP, INC.	§ § § § §	CIVIL ACTION NO. 12-cv-00893 JURY TRIAL DEMANDED
Plaintiffs,	§ §	
v.	§ §	
VOLUSION, INC.	§ §	
Defendant.	§ §	

PLAINTIFFS' PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Court's Docket Control Order (Doc. No. 27), Plaintiffs Versata Software, Inc., F/K/A Trilogy Software, Inc.; and Versata Development Group, Inc., F/K/A Trilogy Development Group, Inc. ("Versata" or "Plaintiffs") respectfully serves its Proposed Claim Constructions. Versata reserves the right to amend or offer additional constructions depending, for example, on the parties' ability or inability to agree on a finalized list of terms for the Court's construction.

U.S. Patent No. 6,834,282

PLAINTIFFS' IDENTIFIED CLAIM TERMS	PLAINTIFFS' PROPOSED CONSTRUCTION
database	Collection of data stored within a computer
node(s)	Representation of an item or set of items stored in a database that inherits the constraints of its ancestors
constraint	Requirement based on an attribute associated with items in a database and a permissible range of values for that attribute
logical grouping	Arbitrary grouping that does not specify one or more constraints
DEFENDANT'S IDENTIFIED CLAIM TERMS	
constraints defining a scope of the subset of	See above for proposed definition of

items represented by each of the first portion relative to their parent node	"constraint"
establishing a logical grouping defining a scope of the subset of the items represented by each of the second portion	See above for proposed definition of "logical grouping"
establishing a logical grouping of the items for a second portion of the nodes, the logical grouping defining a scope of the subset of items represented by each of the second portion of nodes	See above for proposed definition of "logical grouping"
constraint[s]	See above for proposed definition of "constraint"

U.S. Patent No. 7,426,481

PLAINTIFFS' IDENTIFIED CLAIM TERMS	PLAINTIFFS' PROPOSED CONSTRUCTION
product features	Available properties of a product
product model identifier	Identifying model information that may be used by a database that is not an attribute
product configurations	Allowable combinations of product features
product attributes	Defined properties of a product
DEFENDANT'S IDENTIFIED CLAIM TERMS	
database	Collection of data stored within a computer
product selection[s]	Identified product[s]
product configuration information / product configuration	Product features and product rules governing allowable combinations of the product features/ allowable combinations of product features
identify[ing] products stored in [the / a] memory based on two different types, (A) and (B), of product identification	No construction necessary.
product identification	No construction necessary.
product model identifier	Identifying model information that may be used by a database other than an attribute
product identifier	Identifying information that may be used by a database other than an attribute
if the product related data represents	No construction necessary.
receiving a product identifier and identifying each combination of attributes stored in the database that corresponds to the product identifier, if the product related data represents the product identifier, if the product related data represents the product identifier	Receiving a product identifier and identifying each combination of attributes stored in the database that corresponds to the product identifier, if the product related data represents the product identifier

Dated: June 17, 2013

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2013, a copy of Plaintiffs' Proposed Terms and Claim

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