



FST's proposed constructions for each disputed claim term from the FST patents-in-suit, as well as its identification of supporting evidence, are set forth in Exhibit A. Oracle's proposed constructions for each disputed claim term from the FST patents-in-suit, as well as its identification of supporting evidence, are set forth in Exhibit B.

(c) **Time for Claim Construction Hearing**

FST believes that 3 hours will be sufficient for the claim construction hearing.

Oracle believes that 6 hours will be sufficient for the claim construction hearing.

(d) **Witnesses**

If the Court permits live expert testimony, Oracle may call Dr. Michael Stonebraker to testify on the subjects set forth in Exhibit C. Otherwise, Oracle may provide Dr. Stonebraker's testimony in the form of a declaration. FST does not believe that expert testimony is necessary. However, to the extent that Oracle relies on expert testimony, FST may rely on expert testimony from Mr. Neeraj Gupta for purposes of rebuttal.

(e) **Other Issues**

FST is not aware of any other issues that should be taken up at a pre-hearing conference before the claim construction hearing. Oracle believes that the issue of whether live expert testimony will be permitted at the Claim Construction Hearing would be appropriately addressed in a brief telephonic pre-hearing conference.

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Robert M. Parker  
Texas State Bar No. 15498000  
rmparker@pbtaylor.com  
PARKER, BUNT & AINSWORTH, P.C.  
100 E. Ferguson, Ste. 1114  
Tyler, TX 75702  
Telephone: (903) 531-3535  
Facsimile: (903) 533-9687

Respectfully submitted,

/s/ Scott L. Cole  
Mike McKool, Jr.  
Lead Attorney  
Texas State Bar No. 13732100  
mmckool@mckoolsmith.com  
Douglas A. Cawley  
Texas State Bar No. 04035500  
dcawley@mckoolsmith.com  
MCKOOL SMITH, P.C.  
300 Crescent Court, Ste. 1500  
Dallas, TX 75201  
Telephone: (214) 978-4000  
Facsimile: (214) 978-4044

Samuel F. Baxter  
Texas State Bar No. 01938000  
sbaxter@mckoolsmith.com  
MCKOOL SMITH, P.C.  
104 E. Houston St., Ste. 300  
P.O. Box O  
Marshall, TX 75670  
Telephone: (903) 923-9000  
Facsimile: (903) 923-9099

Steven J. Pollinger  
Texas State Bar No. 24011919  
spollinger@mckoolsmith.com  
Scott L. Cole  
Texas State Bar No. 00790481  
scole@mckoolsmith.com  
MCKOOL SMITH, P.C.  
300 W. 6th St., Ste. 1700  
Austin, TX 78701-3941  
Telephone: (512) 692-8700  
Facsimile: (512) 692-8744

**ATTORNEYS FOR PLAINTIFFS,  
FINANCIAL SYSTEMS  
TECHNOLOGY (INTELLECTUAL  
PROPERTY) PTY. LTD. AND  
FINANCIAL SYSTEMS  
TECHNOLOGY PTY. LTD.**

/s/ Donald Daybell

Michael Jones (TSB No. 10929400)  
110 N. College  
500 Plaza Tower  
Tyler, Texas 75702  
Telephone: (903) 597-8311  
Facsimile: (903) 593-0846

G. Hopkins Guy, III, (CSB NO. 124811)  
hopguy@orrick.com  
I. Neel Chatterjee (CSB NO. 173985)  
nchatterjee@orrick.com  
Elizabeth Howard (CSB NO. 173185)  
ehoward@orrick.com  
Helen Li (CSB NO. 247420)  
hli@orrick.com  
1000 Marsh Road  
Menlo Park, California 94025  
Telephone: (650) 614-7400  
Facsimile: (650) 614-7401

Donald Daybell (CSB NO. 210961)  
ddaybell@orrick.com  
4 Park Plaza, Suite 1600  
Irvine, California 92614-2558  
Telephone: (949) 567-6700  
Facsimile: (949) 567-6710

**ATTORNEYS FOR DEFENDANT  
ORACLE CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Geoffrey L. Smith  
Geoffrey L. Smith

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