

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FINANCIAL SYSTEMS TECHNOLOGY
(INTELLECTUAL PROPERTY) PTY. LTD.
and FINANCIAL SYSTEMS TECHNOLOGY
PTY. LTD.,

Plaintiffs,

v.

CDW LLC and INTERNATIONAL
BUSINESS MACHINES CORPORATION,

Defendants.

Civil Action No. 1:11-cv-08729

Hon. Virginia M. Kendall
Mag. Judge Sheila M. Finnegan

**FINANCIAL SYSTEMS TECHNOLOGY (INTELLECTUAL PROPERTY)
PTY. LTD. AND FINANCIAL SYSTEMS TECHNOLOGY PTY. LTD.'S
LOCAL PATENT RULE 4.1 IDENTIFICATION OF CLAIM
TERMS TO BE CONSTRUED AND PROPOSED CONSTRUCTIONS**

Pursuant to Local Patent Rule 4.1, plaintiffs Financial Systems Technology (Intellectual Property) Pty. Ltd. and Financial Systems Technology Pty. Ltd. (collectively, "FST") hereby provide their identification of claim terms to be construed by the Court along with proposed constructions for such terms as they appear in the asserted claims of United States Patent Nos. RE40,520 and RE40,526 ("the patents-in-suit").

FST's proposed constructions are provided in Exhibit A attached hereto. To the extent that FST does not provide a proposed construction of any term or phrase appearing in any asserted claim of the patents-in-suit, FST relies on the plain and ordinary meaning of such term or phrase for the purposes of claim construction. FST specifically reserves the right to provide a proposed construction or identification of a term's plain and ordinary meaning in response to proposed constructions offered by IBM. FST also reserves the right to offer additional, alternative or revised claim constructions based upon IBM's identification of claim terms for construction and proposed claim constructions.

IBM Ex. 1015

Respectfully submitted,

/s/ Robert A. Conley

Raymond P. Niro

Dean D. Niro

Patrick F. Solon

Dina M. Hayes

Robert A. Conley

Oliver D. Yang

NIRO, HALLER & NIRO

181 W. Madison, Suite 4600

Chicago, IL 60602

(312) 236-0733

Fax: (312) 236-3137

rniro@nshn.com; dniro@nshn.com

solon@nshn.com; hayes@nshn.com;

rconley@nshn.com; oyang@nshn.com

Robert S. Bramson (*pro hac vice*)

BRAMSON & PRESSMAN

1100 E. Hector Street , Suite 410

Conshohocken, PA 19428

(610) 260-4444

Fax: (610) 260-4445

rbramson@b-p.com

*Attorneys for Financial Systems Technology
(Intellectual Property) Pty. Ltd. and Financial
Systems Technology Pty. Ltd.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 30, 2012 the foregoing
**FINANCIAL SYSTEMS TECHNOLOGY (INTELLECTUAL PROPERTY)
PTY. LTD. AND FINANCIAL SYSTEMS TECHNOLOGY PTY. LTD.'S
LOCAL PATENT RULE 4.1 IDENTIFICATION OF CLAIM
TERMS TO BE CONSTRUED AND PROPOSED CONSTRUCTIONS**

was served upon the following counsel of record via electronic transmission.

Kenneth R. Adamo
kradamo@kirkland.com
William E. Devitt
wdevitt@kirkland.com
Meredith Zinanni
meredith.zinanni@kirkland.com
Joel R. Merkin
joel.merkin@kirkland.com
Eugene Goryunov
egoryunov@kirkland.com
Kirkland & Ellis LLP
300 North LaSalle Street
Chicago, IL 60654

Attorneys for International Business Machines Corporation

/s/ Robert A. Conley
Attorneys for Financial Systems Technology
(Intellectual Property) Pty. Ltd. and Financial
Systems Technology Pty. Ltd.
NIRO, HALLER & NIRO

EXHIBIT A

FST'S PROPOSED CLAIM CONSTRUCTIONS

No.	Term	FST's Proposed Construction
1	table	permanent structure of a relational database which stores queryable and updatable data in rows and columns
2	record	set of data stored in a single row of a table
3	entity	anything about which information can be stored in a database record
4	entity definition table	relational database table that defines one or more entity types and stores one or more entity type records
5	entity type	identification of a class of entity data, said identification being uniquely defined in the entity definition table
6	entity type record	record in an entity definition table, said record containing, as two separate attributes, an entity type and a table identifier of an entity instance table
7	entity instance table	relational database table that stores one or more entity instance records
8	entity instance record	record in an entity instance table, said record constituting an instance of an entity type
9	relation	logical link between entities
10	relation definition table	relational database table that defines one or more relation types and stores one or more relation type records
11	relation type	identification of a class of relation data, said identification being uniquely defined in the relation definition table
12	relation type record	record in a relation definition table, said record containing, as two separate attributes, a relation type and a table identifier of a relation instance table
13	relation instance table	relational database table that stores one or more relation instance records
14	relation instance record	record in a relation instance table, said record constituting an instance of a relation type, said instance containing, as two separate attributes, an identifier of a first entity and an identifier of a second entity, and where said first and second entities are stored in tables separate from the relation instance table
15	search path record	record that describes a search path, said description including a relation
16	inquiry definition table means	relational database table that stores search path records
17	abbreviated results gathering means	memory area that gathers data from one or more relational database tables and stores a subset of attributes from one or more entities, said entity attributes being obtained by execution of a search path record