

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

NETWORK-1 SECURITY SOLUTIONS,
INC., A DELAWARE
CORPORATION

v.

ALCATEL-LUCENT USA INC., A
DELAWARE
CORPORATION, ET AL.

Civil Action No. 6:11-cv-492 (LED)

JURY TRIAL DEMANDED

DEFENDANTS' IDENTIFICATION OF CLAIM
TERMS/PHRASES FOR CONSTRUCTION PURSUANT TO P.R. 4-1

Defendants Alcatel-Lucent USA Inc.; Alcatel-Lucent Holdings Inc.; Avaya Inc.; **Axis Communications AB**; **Axis Communications, Inc.**; Dell Inc.; Hewlett-Packard Company; Huawei Technologies Co., Ltd.; Huawei Technologies USA Inc.; Juniper Networks, Inc.; Polycom, Inc.; Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; Samsung Telecommunications America, LLC; ShoreTel, Inc.; **Sony Corporation**; **Sony Corporation of America**; and **Sony Electronics Inc.** (collectively, "Defendants") provide the following identification of claim terms, phrases, and/or clauses to Plaintiff Network-1 Security Solutions, Inc. ("Network-1") that Defendants contend should be construed by the Court. The claim terms, phrases, and/or clauses are identified with respect to the claim where such terms, phrases, and/or clauses first occur. Any further occurrence of a listed claim term, phrase, and/or clause is intended to receive the same construction as the listed term, phrase, and/or clause, regardless of whether the later occurrence is also listed below.

Defendants reserve the right to modify, supplement, or amend the list of claim terms, phrases, and/or clauses set forth below. Additionally, Defendants reserve the right to separately request construction of portions of the identified claim terms, phrases, and/or clauses.

Defendants further reserve the right to assert that claim terms, phrases, and/or clauses in the patent-in-suit are invalid under 35 U.S.C. § 112, including without limitation the claim terms, phrases, and/or clauses listed herein.

| Claim Term, Phrase, or Clause of U.S. Patent No. 6,218,930 |
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| "data node" [claim 6] |
| "access device" [claims 6, 9] |
| "at least one data signaling pair connected between the data node and the access device and arranged to transmit data therebetween" [claim 6] |
| "data signaling pair" [claims 6, 9] |
| "main power source" [claim 6] |
| "secondary power source" [claims 6, 9] |
| "low level current" [claim 6] |
| "sensing a voltage level" [claim 6] |
| "controlling power supplied by said secondary power source to said access device in response to a preselected condition of said voltage level" [claim 6] |
| "a preselected condition of said voltage level" [claim 6] |
| "continuing to sense voltage level" [claim 9] |
| "decrease power" [claim 9] |

Date: January 24, 2013

Respectfully submitted,

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