<u>SPECIAL MASTER'S RECOMMENDED CONSTRUCTIONS FOR PATENT NO.'s</u> <u>6,425,035, 7,051,147, 7,934, 041 & 7,987,311</u>

Claim Term	Crossroads' Proposed Construction	Defendants' Proposed Construction	Special Master's Recommendation
Storage Router (Page 1 of attached SM CC Chart) '035 Patent: 1, 2, 3, 4, 5, 6, 7, 10 '041 Patent: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 24, 25, 26, 30, 32, 35, 37, 41, 42, 43, 47, 49, 52, 53 '147 Patent: 1, 2, 3, 4, 5, 6, 9 '311 Patent: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 20, 21, 24, 25, 28	Defined by the remainder of the claim and does not require further construction.	A device that routes storage requests from initiator devices/workstations on one transport medium to target storage devices on the other transport medium and routes data between the initiator devices/workstations and target storage devices.	Defined by the remainder of the claim and does not require further construction.
Remote (Page 26 of attached SM CC Chart) '035 Patent: 1, 11 '041 Patent: 1, 2, 3, 4, 7, 12, 13, 19, 20, 21, 22, 23, 26, 31, 32, 37, 38, 39, 40, 43, 48, 49, 53 '147 Patent: 1, 4, 10, 13, 14, 15, 17, 18, 19, 21, 28, 34 '311 Patent: 1, 5, 9, 16, 19, 21, 25	Indirectly connected through at least one serial network transport medium.	Indirectly connected through a storage router to enable network connections from [devices/Fibre Channel initiator devices/workstations] to storage devices at a distance greater than allowed by a conventional parallel interconnect.	Indirectly connected through at least one serial network transport medium.



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Claim Term	Crossroads' Proposed Construction	Defendants' Proposed Construction	Special Master's Recommendation
Storage Device(s) (Page 45 of attached SM CC Chart) '035 Patent: 1, 4, 7, 9, 10, 11, 12, 14 '041 Patent: 1, 2, 3, 4, 7, 12, 13, 19, 20, 21, 22, 23, 26, 31, 32, 37, 38, 39, 40, 43, 48, 49, 53	Any storage device, including, for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.	An electronic device that stores data, including for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.	Any storage device, including, for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.
'147 Patent: 1, 4, 6, 8, 9, 10, 13, 14, 15, 17, 18, 19, 21, 22, 24, 25, 26, 28, 29, 31, 32, 33, 34, 35, 36, 37, 38 '311 Patent:			
1, 5, 9, 16, 19, 21, 25			
Interface between; Interface with a [first transport medium]; and interface with [a second transport medium] (Page 47 of attached SM CC Chart)	Does not require construction.	Directly connect with / directly connect between	Does not require construction.
'035 Patent: 1, 10			
'041 Patent:			
'147 Patent: 1, 9, 14, 21			
'311 Patent: {None}			



Claim Term	Crossroads' Proposed Construction	Defendants' Proposed Construction	Special Master's Recommendation
First Transport Medium / First [Fibre Channel] Transport Medium (Page 68 of attached SM CC Chart) '035 Patent: 1, 2, 5, 7, 10, 11, 12, 13 '041 Patent: 1, 2, 4, 6, 7, 10, 11, 13, 14, 16, 19, 20, 21, 23, 25, 26, 29, 30, 32, 33, 35, 36, 37, 38, 40, 42, 43, 46, 47, 49, 50, 52, 53 '147 Patent: 1, 6, 9, 10, 14, 18, 21, 28, 34	A first communications link.	The phrase "transport medium" has the plain and ordinary meaning as understood by a person of skill in the art. The "second [Fibre Channel] transport medium" is physically separate from the "first [Fibre Channel] transport medium."	The phrase "transport medium" has the plain and ordinary meaning as understood by a person of skill in the art. The "second [Fibre Channel] transport medium" is physically separate from the "first [Fibre Channel] transport medium."
'311 Patent: 1, 5, 7, 8, 9, 10, 12, 15, 16, 19, 21, 23, 24, 25, 26, 28			
Second Transport Medium / Second [Fibre Channel] Transport Medium (Page 71 of attached SM CC Chart)	A second communications link that is physically separate from the first transport medium.	The phrase "transport medium" has the plain and ordinary meaning as understood by a person of skill in the art. The "second [Fibre Channel]	The phrase "transport medium" has the plain and ordinary meaning as understood by a person of skill in the art. The "second [Fibre Channel]
'035 Patent: 1, 6, 7, 10, 11		transport medium" is physically separate	transport medium" is physically separate
'041 Patent: 19, 20, 36, 53		from the "first [Fibre Channel] transport medium."	from the "first [Fibre Channel] transport medium."
'147 Patent: 1, 6, 9, 10, 14, 21, 28, 34			
'311 Patent:			



Claim Term	Crossroads'	Defendants'	Special Master's
Claim Term	Proposed	Proposed	Recommendation
	Construction	Construction	Recommendation
	Construction	Construction	
Supervisor Unit (Page 74 of attached SM CC Chart) '035 Patent: 1, 2, 10 '041 Patent: {None} '147 Patent: 1, 2, 9, 14, 15, 17, 19, 34, 35, 38 '311 Patent: {None}	A processing device that controls operation of the storage router, including handling mapping and access controls.	A device comprising at least: (1) a microprocessor, incorporating independent data and program memory spaces; and (2) associated logic required to implement a standalone processing system and programmed to process data in a buffer in order to map between devices and which implements access controls.	A device comprising at least: (1) a microprocessor, incorporating independent data and program memory spaces; and (2) associated logic required to implement a standalone processing system and programmed to process data in a buffer in order to map between devices and which implements access controls.
Map/Mapping (Page 78 of attached SM CC Chart) '035 Patent: 1, 7, 10, 11 '041 Patent: 1, 2, 4, 5, 6, 9, 16, 20, 21, 23, 24, 25, 28, 35, 37, 38, 40, 41, 42, 45, 52 '147 Patent: 1, 6, 9, 10, 14, 15, 16, 17, 21, 22, 23, 24, 28, 29, 30, 31, 34, 35, 36 '311 Patent: 1, 4, 6, 12, 16, 19, 20, 22, 28	To create a path from a device on one side of the storage router to a device on the other side of the router. A "map" contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate with a device on the other side of the storage router, the storage router can connect the devices.	To create a known path for block-addressed data and commands from a particular device on one side of the storage router to a particular remote physical storage device on the other side of the router. A "map" contains a representation of the particular devices on each side of the storage router, so that before a particular workstation/device on one side of the storage router tries to communicate with a particular remote physical storage device on the other side of the storage router, the storage router, the storage router already has stored a path from the	To create a path from a device on one side of the storage router to a device on the other side of the router. A "map" contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate with a device on the other side of the storage router, the storage router can connect the devices.



Claim Term	Crossroads'	Defendants'	Special Master's
	Proposed Construction	Proposed	Recommendation
	Construction	particular workstation/device to the particular remote physical storage device over which the storage router will route block-addressed requests and data between the devices.	
Implement(ing) (s) access controls for storage space on the (remote) storage devices (Page 113 of attached SM CC Chart) '035 Patent: 1, 7, 10, 11 '041 Patent: {None} '147 Patent: 1, 6, 9, 10, 28	Provides controls which limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map.	Provide/providing controls that limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map for the [device/Fibre Channel initiator device/workstation].	Provides controls which limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map.
'311 Patent: {None} Access Controls (Page 117 of attached SM CC Chart) '035 Patent: 1, 7, 8, 10, 11 '041 Patent: {None} '147 Patent: 1, 6, 7, 9 10, 28, 34 '311 Patent: {None}	Controls which limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map.	Controls which limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map for the [device/Fibre Channel initiator device/workstation].	Controls which limit a [device/Fibre Channel initiator device/workstation]'s access to a specific subset of storage devices or sections of a single storage device according to a map.



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