

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

| Claim Term | Crossroads' Proposed Construction | Defendants' Proposed Construction | Special Master's Recommendation |
|---|---|---|---|
| <p>Storage Router (Page 1 of attached SM CC Chart)</p> <p>'035 Patent: 1, 2, 3, 4, 5, 6, 7, 10</p> <p>'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</p> <p>'147 Patent: 1, 2, 3, 4, 5, 6, 9</p> <p>'311 Patent: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 20, 21, 24, 25, 28</p> | <p>Defined by the remainder of the claim and does not require further construction.</p> | <p>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.</p> | <p>Defined by the remainder of the claim and does not require further construction.</p> |
| <p>Remote (Page 26 of attached SM CC Chart)</p> <p>'035 Patent: 1, 11</p> <p>'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</p> <p>'147 Patent: 1, 4, 10, 13, 14, 15, 17, 18, 19, 21, 28, 34</p> <p>'311 Patent: 1, 5, 9, 16, 19, 21, 25</p> | <p>Indirectly connected through at least one serial network transport medium.</p> | <p>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.</p> | <p>Indirectly connected through at least one serial network transport medium.</p> |

CROSSROADS EXHIBIT 2034

| Claim Term | Crossroads' Proposed Construction | Defendants' Proposed Construction | Special Master's Recommendation |
|--|---|---|---|
| <p>Storage Device(s) (Page 45 of attached SM CC Chart)</p> <p>'035 Patent: 1, 4, 7, 9, 10, 11, 12, 14</p> <p>'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</p> <p>'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</p> <p>'311 Patent: 1, 5, 9, 16, 19, 21, 25</p> | <p>Any storage device, including, for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.</p> | <p>An electronic device that stores data, including for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.</p> | <p>Any storage device, including, for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.</p> |
| <p>Interface between; Interface with a [first transport medium]; and interface with [a second transport medium] (Page 47 of attached SM CC Chart)</p> <p>'035 Patent: 1, 10</p> <p>'041 Patent: 1</p> <p>'147 Patent: 1, 9, 14, 21</p> <p>'311 Patent: {None}</p> | <p>Does not require construction.</p> | <p>Directly connect with / directly connect between</p> | <p>Does not require construction.</p> |

| Claim Term | Crossroads' Proposed Construction | Defendants' Proposed Construction | Special Master's Recommendation |
|--|--|--|--|
| <p>First Transport Medium / First [Fibre Channel] Transport Medium (Page 68 of attached SM CC Chart)</p> <p>'035 Patent: 1, 2, 5, 7, 10, 11, 12, 13</p> <p>'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</p> <p>'147 Patent: 1, 6, 9, 10, 14, 18, 21, 28, 34</p> <p>'311 Patent: 1, 5, 7, 8, 9, 10, 12, 15, 16, 19, 21, 23, 24, 25, 26, 28</p> | <p>A first communications link.</p> | <p>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."</p> | <p>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."</p> |
| <p>Second Transport Medium / Second [Fibre Channel] Transport Medium (Page 71 of attached SM CC Chart)</p> <p>'035 Patent: 1, 6, 7, 10, 11</p> <p>'041 Patent: 19, 20, 36, 53</p> <p>'147 Patent: 1, 6, 9, 10, 14, 21, 28, 34</p> <p>'311 Patent: 1</p> | <p>A second communications link that is physically separate from the first transport medium.</p> | <p>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."</p> | <p>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."</p> |

| Claim Term | Crossroads' Proposed Construction | Defendants' Proposed Construction | Special Master's Recommendation |
|---|---|--|---|
| <p>Supervisor Unit (Page 74 of attached SM CC Chart)</p> <p>'035 Patent: 1, 2, 10</p> <p>'041 Patent: {None}</p> <p>'147 Patent: 1, 2, 9, 14, 15, 17, 19, 34, 35, 38</p> <p>'311 Patent: {None}</p> | <p>A processing device that controls operation of the storage router, including handling mapping and access controls.</p> | <p>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.</p> | <p>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.</p> |
| <p>Map/Mapping (Page 78 of attached SM CC Chart)</p> <p>'035 Patent: 1, 7, 10, 11</p> <p>'041 Patent: 1, 2, 4, 5, 6, 9, 16, 20, 21, 23, 24, 25, 28, 35, 37, 38, 40, 41, 42, 45, 52</p> <p>'147 Patent: 1, 6, 9, 10, 14, 15, 16, 17, 21, 22, 23, 24, 28, 29, 30, 31, 34, 35, 36</p> <p>'311 Patent: 1, 4, 6, 12, 16, 19, 20, 22, 28</p> | <p>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.</p> | <p>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 already has stored a path from the</p> | <p>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.</p> |

| Claim Term | Crossroads' Proposed Construction | Defendants' Proposed Construction | Special Master's Recommendation |
|--|---|---|---|
| | | 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. | |
| <p>Implement(ing) (s) access controls for storage space on the (remote) storage devices (Page 113 of attached SM CC Chart)</p> <p>'035 Patent: 1, 7, 10, 11</p> <p>'041 Patent: {None}</p> <p>'147 Patent: 1, 6, 9, 10, 28</p> <p>'311 Patent: {None}</p> | 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. |
| <p>Access Controls (Page 117 of attached SM CC Chart)</p> <p>'035 Patent: 1, 7, 8, 10, 11</p> <p>'041 Patent: {None}</p> <p>'147 Patent: 1, 6, 7, 9 10, 28, 34</p> <p>'311 Patent: {None}</p> | 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. |

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.