<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	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.
'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, 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}			



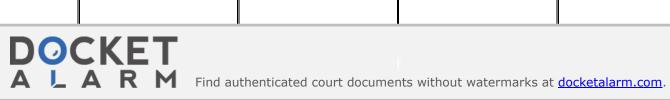
Claim Term	Crossroads'	Defendants'	Special Master's
	Proposed	Proposed	Recommendation
	Construction	Construction	
First Transport Medium / First [Fibre Channel] Transport Medium (Page 68 of attached SM CC Chart) '035 Patent: 1, 2, 5, 7, 10, 11, 12, 13 '041 Patent: 1, 2, 4, 6, 7, 10, 11, 13, 14, 16, 19, 20, 21, 23, 25, 26, 29, 30, 32, 33, 35, 36, 37, 38, 40, 42, 43, 46, 47, 49, 50, 52, 53	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."
'147 Patent: 1, 6, 9, 10, 14, 18, 21, 28, 34			
'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) '035 Patent:	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] transport medium" is	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
1, 6, 7, 10, 11 '041 Patent: 19, 20, 36, 53		physically separate from the "first [Fibre Channel] transport medium."	physically separate 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	Special Master's Recommendation
	Construction	Construction	Recommendation
	Constituction	Consti action	
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, 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 already has	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, the storage router can connect the devices.



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.	
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 '311 Patent:	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.
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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