

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 01-06-CIV-21359
JUDGE JAMES LAWRENCE KING
MAGISTRATE JUDGE GARBER**

**ROTHSCHILD TRUST
HOLDINGS, LLC,**

Plaintiff,

vs.

**CITRIX SYSTEMS, INC.,
CITRIX ONLINE, LLC,**

Defendants.

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**JOINT CLAIM CONSTRUCTION AND
PREHEARING STATEMENT**

Pursuant to the August 7, 2006 Order on Joint Scheduling Conference, Plaintiff Rothschild Trust Holdings, LLC, (“Rothschild”) and Defendants Citrix Systems, Inc., and Citrix Online, LLC (collectively “Citrix”) submit the following Joint Claim Construction and Prehearing Statement.

A. The Construction of those claims, terms, phrases or clauses on which the parties agree:

U.S. Patent No. 6,101,534 Claim Term or Phrase	Agreed Construction
1. “primary site address” (claim 1)	A distinct location on the remote server assembly.
2. “said primary site address including at least a portion of said primary site data” (claim 1)	At least a portion of the primary site data is included at the primary site address.
3. “a plurality of remotely accessible, auxiliary site addresses encoded therein” (claim 1)	Two or more distinct locations on the interchangeable computer readable medium. Each distinct location can be accessed remotely.

U.S. Patent No. 6,101,534 Claim Term or Phrase	Agreed Construction
4. "structured to signal a non-presence of said compact, portable and interchangeable computer readable medium" (claim 5)	Put together so as to indicate when no compact, portable, interchangeable computer readable medium is present.
5. "the claimed local processor assembly includes a data entry assembly associated therewith" (claim 10)	The local processor assembly includes a device for writing data to a particular location, such as a computer keyboard.
6. "The claimed data entry assembly being structured to provide for an input of at least a portion of said auxiliary site data into a corresponding one of said auxiliary site addresses of said compact, portable and interchangeable computer readable medium" (claim 10)	The data entry assembly can be used to write at least some of the auxiliary site data to the compact, portable and interchangeable computer readable medium at one of the auxiliary site addresses.
7."a compression assembly structured to compress said auxiliary site data inputted by said data entry assembly onto said compact, portable and interchangeable computer readable medium" (claim 11)	A device that stores the auxiliary site data onto the compact, portable and interchangeable computer readable medium in a way that makes the data take up less space than it would in its non-compressed form.
8. "a receiver assembly structured to receive a remotely transmitted signal containing at least some of said auxiliary site data" (claim 12)	A device that accepts a remotely transmitted signal containing auxiliary site data.
9. "an interlaced broadcast signal" (claim 14)	A broadcast signal that alternates or intermixes audio and video data.

B. Each party's proposed construction of each disputed claim term, phrase, or clause.

Rothschild contends that the Court does not need to construe any terms from the asserted patent claims. Citrix contends that a number of claim terms need to be construed by the Court. The parties' proposed constructions for the disputed claim terms identified by Citrix are set forth below:

U.S. Patent No. 6,101,534 Claim Term or Phrase	Rothschild's Original Proposed Construction	Rothschild's Proposed Construction	Citrix's Proposed Construction
1. "remote server assembly" (claim 1)	Inadvertently not submitted.	A computer that is in a network usually shared by multiple users; it is separate from a user computer but can communicate with a user computer via an online connection.	A computer that is in a network usually shared by multiple users; it is separate from the user and local computer assembly, but is accessible to the user and local processor assembly via an online connection.
2. "primary site data" (claim 1)	The content and/or data found at a distinct location on a server such as a Website on the Internet.	Data at a location on the remote server assembly.	The principal data that a user of the claimed system seeks to access and interface with.
3. "local processor assembly" (claim 1)	Any electronic device having a processor (hereafter "the Device"), including but not limited to desktop and laptop computers, wireless devices, mobile phones, pagers, handheld computers, set top boxes such as Digital Video Recorders, portable media players, video game consoles, etc.	A computer at a location distinct from the remote server assembly.	A computer at the user's location; in contrast to a "remote" server assembly, the user can access data on the claimed "local" processor assembly without an on-line connection.
4. "said local processor assembly being coupled in data transmitting and receiving communication with said remote server assembly" (claim 1)	The Device can communicate with the Server such as by accessing the internet (hereafter an "Internet Capable Device")	The local processor assembly and the remote server assembly are connected to one another in a manner that permits the transmission and receipt of data.	The local processor assembly and the remote server assembly are connected to one another in a manner that allows each assembly to transmit data to, and receive data from, the other assembly.

U.S. Patent No. 6,101,534 Claim Term or Phrase	Rothschild's Original Proposed Construction	Rothschild's Proposed Construction	Citrix's Proposed Construction
5. "said local processor assembly being structured to access said primary site address so as to achieve said data transmitting and receiving communication with said remote server assembly" (claim 1)	An Internet capable Device that can access the distinct location on the Server and can send/receive information to/from the Server	The local processor assembly can communicate with the primary site address of the remote server assembly in a manner that permits the transmission and receipt of data.	The local processor assembly creates the coupling between it and the remote server assembly by locating, gaining entry to, and using data at the primary site address.
6. "at least one data storage assembly associated with said local processor assembly" (claim 1)	The Device has at least one means of storing content and data such as an internal or external hard drive, CD-Rom drive, DVD-Rom drive, floppy disc drive, flash or memory card reader or other means of data storage (hereafter he "Storage Medium Storage Medium").	The local processor assembly includes at least one place for holding data.	The local processor assembly includes at least one structure for holding data.
7. "auxiliary site data" (claim 1)	Content and/or data stored on the Device within a Storage Medium	Data on a location on the local processor assembly.	Data that supplements or aids the claimed primary site data.

U.S. Patent No. 6,101,534 Claim Term or Phrase	Rothschild's Original Proposed Construction	Rothschild's Proposed Construction	Citrix's Proposed Construction
8. "said auxiliary site data being associated with said primary site data" (claim 1)	The content and/or data on the Storage Medium has a past, present or future association with the content and/or data on the server/website.	Auxiliary site data is capable of interacting with the primary site data.	The auxiliary site data concerns the same subject matter as the claimed primary site data and provides additional information on that subject matter. For example, if the primary site data concerns a particular real estate space, the associated auxiliary site data may include video images of that particular real estate space.
9. "a compact, portable and interchangeable computer readable medium" (claim 1)	The "Storage Medium" can be removed or disconnected from the Device and used with other Devices.	A computer readable medium that is small, can be carried easily and can be swapped.	A computer readable medium that is small, can be carried easily, and can be mutually substituted. Examples include a CD-ROM or a DVD. In contrast, the local processor assembly's hard drive is not "a compact, portable and interchangeable computer readable medium."

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