

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AUTOMATION MIDDLEWARE
SOLUTIONS, INC.,

Plaintiff,

v.

INVENSYS SYSTEMS, INC.,
SCHNEIDER ELECTRIC USA, INC.,

Defendants.

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CIVIL ACTION NO. 2:15-CV-00898-RWS
(LEAD CASE)

PRELIMINARY CLAIM CONSTRUCTIONS¹

| CLAIM TERM | PRELIMINARY CONSTRUCTION |
|---|--|
| Application Program | a software program designed to handle specific tasks |
| Driver Functions | hardware independent functions that are separate and distinct from the component functions and <u>that directly control</u> software drivers |
| Software Driver/Driver | one or more controller dependent software modules that <u>generates hardware specific control-codes</u> to implement the <u>core driver functions</u> on the associated hardware device or group of related hardware devices |
| Motion Control | Plain and ordinary meaning. |
| Motion Control Operation/Motion Operation | hardware independent operations (such as GET POSITION, MOVE RELATIVE, or CONTOUR MOVE) that are performed by a motion control device |
| Developing/Defining | Plain and ordinary meaning. No “person” or “user” is required. |
| Desired/A Desired Manner/ A Desired Motion Sequence | Plain and ordinary meaning. No “person” or “user” is required. |

¹ These preliminary constructions are only meant to indicate where the Judge stands after considering the claim construction briefing. He may change his position based on the parties’ arguments.

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| Primitive Operations | motion control operations that cannot be simulated using a combination of other motion control operations |
| Non-Primitive Operations | motion control operations that can be simulated using a combination of other motion control operations |
| Associates with/ Associates | Plain and ordinary meaning. |
| Workstation/[Runs/Operates/ Operating] on [] Workstation | Plain and ordinary meaning. |
| Motion Control Component/Motion Component | an intermediate software layer containing code that is separate and distinct from the application program and the software driver |
| Control Command Generating Module | Plain and ordinary meaning. |
| Component Code | software code in the motion control component that associates at least some of the component functions with at least some of the driver functions |
| Driver Code | code associated with a hardware device or group of related hardware devices, which helps generate commands necessary to perform motion control operations associated with at least some driver functions |
| A Controller Capable of Generating Electrical Signals Based on at Least One Control Command of the Controller Language Associated with the Motion Control Device | Plain and ordinary meaning. |