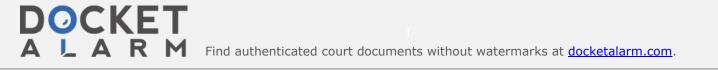
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EXHIBIT A



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U.S. Patent No. 5,887,243

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Claim		Amazon's Proposed	PMC's Proposed
13	Claim Language	Constructions	Constructions
	mass medium program	recited result (coordinate	indefinite. Plain and ordinary
	and a program segment	presentation). Even	meaning.
	presentation sequence.	interpreting the recited	C C
		claimed result under 35	
		U.S.C. § 112(f) is insufficient	
		to save the validity of the	
		claim because there is no	
		disclosure in the specification	
		of any algorithm showing how	
		the function is achieved that is	
		clearly linked to the claim	
		language.	
		"coordinate presentation"	"coordinate presentation"
		means overlay said data of	requires no construction.
		interest on the mass medium	requires no construction.
		program or the program	
		presentation sequence based	
		on a specifically defined	
		relationship between the mass	
		medium program or the	
		program segment presentation	
		sequence and the data of	
		interest.	"mass medium program"
			means everything that is
		"mass medium program"	transmitted electronically to
		means a television, radio or	entertain, instruct or inform,
		broadcast print program that is sent simultaneously to a mass	including television, radio, broadcast print, and computer
		of subscribers such that the	programming as well as
		content is the same for every	combined medium
		subscriber.	programming, designed for
			multiple recipients.
		"program segment	
		presentation sequence" is	"program segment
		indefinite.	presentation sequence" is not
			indefinite. It means "a
			sequence in which program
			segments are presented."

DOCKET

Claim		Amazon's Proposed	PMC's Proposed
1	Claim Language	Constructions	Constructions
1(pre)	A method for controlling	"decryption" means decoding,	"decryption" means using a
ч <i>і</i>	the decryption of	including deciphering and	digital key in conjunction
	programming at a	descrambling. This	with a set of associated
	subscriber station, said	construction applies for every	mathematical operations to
	method comprising the	related term in the '304 and	decipher data. This term
	steps of:	'749 patents, such as	does not include
		"encryption," "encrypted,"	descrambling of an analog
		"decryptor," "decrypting,"	television signal.
		"decrypt," and "decrypter."	
		"programming" means	"programming" means
		something that is transmitted	everything that is transmitted
		electronically to entertain,	electronically to entertain,
		instruct or inform, including	instruct or inform, including
		television, radio, broadcast	television, radio, broadcast
		print, and computer programs	print, and computer
		as well as combined medium	programming, at least a
		programs.	portion designed for multiple
			recipients.
		"subscriber station" means	
		the station of someone who has	"subscriber station" — see
		elected to receive a product or service on a regularly-	proposed construction of "subscriber." This term does
		scheduled basis.	not require further
		seneduled basis.	construction.
1(a)	receiving programming,		
	said programming having		
	a first encrypted digital		
	control signal portion and		
	an encrypted digital		
1(b)	information portion;		
1(b)	detecting said first		
	encrypted digital control signal portion of said		
	programming;		
1(c)	passing said first encrypted	"decryptor" means standard	"decryptor" does not require
	digital control signal	decryption hardware or analog	construction.
	portion of said	descrambling hardware capable	
	programming to a	of receiving encrypted	
	decryptor at said	information, using	
	subscriber station;	conventional decryption	

U.S. Patent No. 7,801,304

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Claim	Claim Language	Amazon's Proposed	PMC's Proposed
1		Constructions	Constructions
		techniques well known in the art as of 1987 to decrypt the encrypted information, and outputting the decrypted information.	
1(d)	decrypting said first	"decrypting said first	"decrypting said first
1(4)	encrypted digital control	encrypted digital control	encrypted digital control
	signal portion of said	signal portion of said	signal portion of said
	programming using said	programming" is indefinite	programming" is not
	decryptor at said	because it attempts to claim all	indefinite. This term does
	subscriber station;	ways of achieving the recited result (decryption). Even interpreting the claimed result under 35 U.S.C. § 112(f) is insufficient to save the validity of the claim because there is no disclosure in the specification of any algorithm showing how the function is achieved that is clearly linked to the claim language.	not require construction. This term is not a step-plus- function claim element requiring 35 U.S.C. § 112(f) construction.
		To the extent that 35 U.S.C. § 112(f) saves this limitation, the only act described in the specification is decrypting the information using conventional decryption techniques well known in the art as of 1987. Therefore, to the extent this claim is not indefinite, it should be construed pursuant to 35 U.S.C. § 112(f) as covering the acts recited above and equivalents thereof.	
1(e)	passing said encrypted digital information portion of said programming to said decryptor;		
1(f)	decrypting said encrypted digital information portion of said programming using said decryptor at said	"decrypting said encrypted digital information portion of said programming" is indefinite. <i>See</i> Claim 1(d) above.	"decrypting said encrypted digital information portion of said programming" is not indefinite.

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