

	particular group and (2) receive group messages addressed to that particular group.
“list of message groups”	No construction necessary.
“payload portion”	The part of a message that contains data item(s) conveying information.
“portion for identifying said first message group”	Any part of a message, sent by a host computer to a group messaging server, that identifies the message group of a receiving host computer.
“portion that is used to identify said message group”	Any part of a message, sent by a host computer to a group messaging server, that identifies the message group of a receiving host computer.
“creating . . . said first message group by sending a first control message”	A host computer sends a control message that creates a message group with at least one host computer as a member.
“create message”	A message creating a message group.
“joining . . . said first message group by sending control messages”	The method by which host computers become members of a particular message group by sending control messages.
“join message”	A message causing a host to become a member of a message group.
“session layer protocol”	A protocol for a layer in the OSI reference model on top of the transport layer protocol.
“shared, interactive application”	Software operating on multiple host computers that provides for sufficient interaction to allow users of the hosts to share an application or experience.
“suppressing”	To prevent from reaching.

LPR 4-3(b) Proposed Constructions for Terms in Dispute

See Exhibit A for a chart showing the parties’ proposed constructions with intrinsic and extrinsic evidence supporting such constructions.

LPR 4-3(c) Anticipated Length of Time for Claim Construction Hearing

The parties agree that 90 minutes per side will be sufficient time to present their case. Thus, the parties anticipate the claim construction hearing will last no more than 3 hours.

LPR 4-3(d) Anticipated Witnesses at the Claim Construction Hearing

Neither party currently expects to call any witnesses at the claim construction hearing.

LPR 4-3(e) Other Issues to Be Addressed at Claim Construction Prehearing Conference

The parties are not aware of any other issues at this time that might be appropriately addressed at a prehearing conference prior to the Claim Construction Hearing.

PalTalk objects to Defendants' citation of extrinsic evidence in this PR 4-3 statement because Defendants cited no extrinsic evidence in their PR 4-2 Preliminary Claim Constructions and Extrinsic Evidence. Defendants disagree with PalTalk's objection. Defendants were not aware that they may wish to rely on these materials until after they received PalTalk's preliminary claim constructions, which were inconsistent with PalTalk's prior arguments to this Court and the resulting Claim construction Orders. PalTalk was surely aware of these materials and will suffer no prejudice in addressing its own prior contentions in its opening brief, which is not due for nearly three weeks. Further, Defendants' citations to PalTalk's prior claim construction briefing and this Court's prior Claim Construction Orders are not the type of extrinsic evidence contemplated under PR 4-2(b), and Defendants include such citations only out of an abundance of caution.

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