EXHIBIT A (UPDATED)

The updated tables below show the parties' agreed and disputed claim construction terms for the asserted claims of U.S. Patent Nos. 6,088,802 ("'802 Patent") and 6,003,135 ("'135 Patent). The update to this exhibit was necessitated by changes SPEX made to its claim construction positions on July 13, 2017, the due date for opening claim construction briefs.

SPEX informed Defendants on the morning of July 13, 2017 that it would agree to Defendants' construction for "means for enabling communication between the security means and the target means," but it did not communicate its modified constructions for Terms 2, 3, 5, and 10 to Defendants until after Defendants' opening claim construction brief had been filed.

Agreed Constructions

Claim Term	Agreed Construction
"means for non-volatilely storing data" ('802 Patent, claims 2, 7, 12, 25)	Subject to 35 U.S.C. § 112(6). Recited Function: non-volatilely storing data Corresponding Structure: non-volatile memory devices; or equivalents thereof.[1]
"target means for enabling a defined interaction with a host computing device" ('802 Patent, claims 1-2, 6-7, 11-12, 23, 25)	Subject to 35 U.S.C. § 112(6). Recited function: enabling a defined interaction with a host computing device Corresponding structures: (1) a memory module adapted to enable non-volatile storage of data, (2) a communications module adapted to enable communications between the host computing device and a modem or LAN transceiver, (3) a smart card reader, or (4) biometric device, or equivalents thereof.[2]

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[1] Although Defendants agree that 35 U.S.C. § 112(6) permits "equivalents" of the disclosed structure for the purposes of an infringement analysis, Defendants disagree that "equivalents" should be included as part of claim construction or that "equivalents" form part of the "corresponding structure," as "equivalents" are not disclosed in the patent.

[2] See footnote 1.

Claim Term	Agreed Construction
	Notwithstanding the Parties' agreement as to relevant structure, Defendants maintain that this term is invalid for indefiniteness in view of its inclusion of the words "defined interaction," a term that the Parties are separately briefing.
"means for enabling communication between the security means and the target means" ('802 Patent, claims 1-2, 6-7, 11-12, 23, 25)	Subject to 35 U.S.C. § 112(6). Recited function: enabling communication between the security means and the target means Corresponding structure: conventional computer bus 615; or equivalents thereof.[3]

10 Most Significant Disputed Terms as Identified in the Amended Joint Claim Construction Chart

Claim Term	SPEX's Proposal	Defendants' Proposal
1. "defined interaction" (all asserted claims)	**SPEX Proposal:** a specific, predefined functionality of the device, such as data storage, data communication, data input and output or user identification	**Defendants Proposal:** Indefinite under 35 U.S.C. § 112.
1a. "interaction with a host computing device in a defined way" ('802 Patent, claims 38-39)	**SPEX Proposal:** interaction with a host computing device using a specific, predefined functionality of the device, such as data storage, data communication, data input and output or user identification	**Defendants Proposal:** Indefinite under 35 U.S.C. § 112.
2. "peripheral device" ('802 Patent, all asserted claims)	**SPEX Proposal:** Any device that operates outside of a host computing device (i.e. the keyboard-computer-screen system) and that is connected to the host computing device.	**Defendants Proposal:** Any device that operates outside of a host computing device and that is connected to the host computing device

[3] See footnote 1.

Claim Term	SPEX's Proposal	Defendants' Proposal
	Typical peripheral devices include but are not limited to a disk drive and a printer.	
3. "security means for enabling one or more security operations to be performed on data" ('802 Patent, claims 1-2, 6-7, 11-12, 23, 25) "means for performing the one or more security operations" ('802 Patent, claim 39)	**SPEX Proposal:** Subject to 35 U.S.C. ¶ 112(6) Recited function: enabling one or more security operations to be performed on data Corresponding structure: 1. Cryptographic processing device 801 (special purpose processor capable of performing the cryptographic operations, as described at '802 patent, 15:63-15:57); 2. Security token (device that performs security operations and that includes one or more mechanisms (such as, for example, use of a hardware random number generator and/or protected memory) to provide security for the content of those operations as described at '802 patent at 5:35-39); 3. A specific hardware component programmed or configured to perform a security operation disclosed at 18:1-47 of the '802 Patent or 21:29 – 22:9 of the '135 Patent; 4. A special purpose embedded processor,	**Defendants Proposal:** Governed by 35 U.S.C. § 112(6). Recited function: (1) enabling security operations to be performed on data; (2) performing the security operations; Corresponding structure: 1. A specific hardware component programmed or configured to perform a security operation disclosed at 18:1-47 of the '802 Patent or 21:29 – 22:9 of the '135 Patent. 2. A special purpose embedded processor, embodied on a single integrated chip and designated as MYK-82 (and also referred to by the name Capstone), which includes an ARM6™ processor core and several special purpose cryptographic processing elements that have been developed by the Department of Defense.

Claim Term	SPEX's Proposal	Defendants' Proposal
	embodied on a single integrated chip and designated as MYK-82 (and also referred to by the name Capstone), which includes an ARM6™ processor core and several special purpose cryptographic processing elements that have been developed by the Department of Defense ('802 patent at 15:67-16:8); or 5. Equivalents thereof	
3a. "security module that is adapted to enable one or more security operations to be performed on data" ('135 Patent, claims 55–58)[4]	**SPEX Proposal:** This is not subject to 35 U.S.C. ¶ 112(6). If this phrase is subject to 35 U.S.C. ¶ 112(6): Recited function: enabling one or more security operations to be performed on data Corresponding structure: see the previous term	**Defendants Proposal:** Governed by 35 U.S.C. § 112(6). Recited function: enable security operations to be performed on data Corresponding structure: See corresponding structure provided above for "security means for enabling one or more security operations to be performed on data" and "means for performing the one or more security operations."
6. "means for enabling communication between the security means	The proposed construction for this term has been moved to the "Agreed Constructions" section as the parties reached agreement on the proper construction of this term on July 13, 2017.	

[4] Defendants erroneously referred to this term as "Term 3b" in their opening brief, when the term should have been identified as "Term 3a" in accordance with its identification in the Amended Joint Claim Construction Chart.

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