Plaintiffs' #	Claim	Terms, Phrases and Clauses	Defendants' Prior Proposal	Plaintiffs' Proposal
6	'766 patent claim 13	**"computer readable program code means for determining the license availability for the selected one of the plurality of application programs for the user based on the maintained license management policy information"**	Computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 Patent, implementing the algorithms described at '578 patent at col. 5:38-61; 11:32-38; 12:37-56, 12:63-13:49; FIG. 5 blocks 188, 190, 192; and '466 patent at col. 13:58-14:1, 14:9-23	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:38-61, 11:32-38, 12:37-46, 12:50-14:12; FIG. 5, blocks 188, 190, 192 and '466 patent at col. 13:58-14:1, 14:9-23
20	'766 patent claim 13	**"computer readable program code means for maintaining license management policy information for a plurality of application programs at a license management server, the license management policy information including at least one of a user identity based policy, an administrator policy override definition or a user policy override definition"**	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:38-61; 11:32-38; 12:37-62, 13:29-32, 13:42-47	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:38-61 11:32-38; 12:37-62, 13:29-32, 13:42-47

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Plaintiffs' #	Claim	Terms, Phrases and Clauses	Defendants' Prior Proposal	Plaintiffs' Proposal
36	'766 patent claim 13	**computer readable program code means for providing an unavailability indication to the client responsive to the selection if the license availability indicates that a license is not available for the user or an availability indication if the licensed availability indicates that a license is available for the user**	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at col. 5:44-53	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:44-57, and the '466 patent at col. 13:58-14:1, 14:9-23, 16:45-56
39	'766 patent claim 13	**computer readable program code means for receiving at the license management server a request for a license availability of a selected one of the plurality of application programs from a user at a client**	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 patent at 5:38-61; 11:32-38; 12:37-13:18, 13:36-38; FIG. 5 block 186; and '466 patent at col. 13:58-14:1, 14:9-23	computer program instructions for execution by a processor, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 patent at 5:38-61 11:32-38; 12:37-13:18; 13:36-38; FIG. 5 block 186; and '466 patent at col. 13:58-61, 14:9-23

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Plaintiffs' #	Claim	Terms, Phrases and Clauses	Defendants' Prior Proposal	Plaintiffs' Proposal
47	'293 patent claim 17	**"computer readable program code means that distributes the file packet to the target on-demand server to make the application program available for use by a user at a client"**	computer program instructions for execution by a processor, as described in col. 12:3-27, implementing the algorithms described in connection with block 116 of FIG. 8 and FIG. 9B and at col. 17:61-65, 18:4-21, 18: 30-36, 19:39-20:5	computer program instructions for execution by a processor, as described in col. 12:1-24 of the '466 patent, implementing the algorithms described in the '466 patent in connection with block 116 of FIG. 8 and FIG. 9B and at col. 17:58-62, 18:1-18, 18:26-32, 19:34-67
48	'293 patent claim 17	**"computer readable program code means that prepares a file packet associated with the application program"**	computer program instructions for execution by a processor, as described in col. 12:3-27, implementing the algorithms described in connection with FIG. 9A and blocks 156, 158, and 168 of FIG. 9B and at col. 18:37 – 19:38, 20:3-5, 20:36-41	computer program instructions for execution by a processor, as described in col. 12:1-24 of the '466 patent, implementing the algorithms described in the '466 patent in connection with FIG. 9A and blocks 156, 158, and 168 of FIG. 9B and at col. 18:33 – 19:33, 19:65-67, 20:31-36

Plaintiffs' #	Claim	Terms, Phrases and Clauses	Defendants' Prior Proposal	Plaintiffs' Proposal
49	'293 patent claim 17	**"computer readable program code that provides to the network management server an application program to be distributed to remote servers"**	If subject to §112(6), then a processor executing computer program instructions, as described in col. 12:3-27, implementing the algorithms described in connection with block 110 of FIG. 8, FIG. 9A, and at col. 8:33-56;14:24-31; 17:35-40; 17:55-58; 18:46-53	If subject to section 112(6), then a processor executing computer program instructions,, as described in col. 12:1-24 of the '466 patent, implementing the algorithms described in the '466 patent in connection with block 110 of FIG. 8 and at col. 8:33-56; 14:24-31; 17:35-40, 17:55-58; 18:42-49
50	'293 patent claim 17	**"computer readable program code that specifies a source directory and a target directory for distribution of the application program"**	If subject to §112(6), then a processor executing computer program instructions, as described in col. 12:3-27, implementing the algorithms described in connection with FIG. 10, block 112 of FIG. 8, and block 132 of FIG. 9A and at col. 17:58-61, 18:39-19:1, 19:19-21, 19:50-54	If subject to section 112(6), then a processor executing computer program instructions, as described in col. 12:1-24 of the '466 patent, implementing the algorithms described in the '466 patent in connection with FIG. 10, block 112 of FIG. 8, and block 132 of FIG. 9A and at col. 17:55-58, 18:35-67, 19:14-16, 19:45-49

Plaintiffs' #	Claim	Terms, Phrases and Clauses	Defendants' Prior Proposal	Plaintiffs' Proposal
55	'766 patent claim 7	**"means for determining the license availability for the selected one of the plurality of application programs for the user based on the maintained license management policy information"**	A processor executing computer program instructions, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:38-61; 11:32-38; 12:37-46, 12:50-14:12; FIG. 5, blocks 188, 190, 192; and ''466 patent at col. 13:58-14:1, 14:9-23	a processor executing computer program instructions, as described in col. 7:26-50 of the '578 patent, implementing the algorithms described in the '578 Patent at 5:38-61, 11:32-38, 12:37-46, 12:50-14:12; FIG. 5, blocks 188, 190, 192 and '466 patent at col. 13:58-14:1, 14:9-23
62	'293 patent claim 12	**"means for distributing the file packet to the target on-demand server to make the application program available for use by a user at a client"**	Except for intro, should be the same as 47.	a processor executing computer program instructions as described in col. 12:1-24 of the '466 patent, implementing the algorithms described in the '466 patent in connection with block 116 of FIG. 8 and FIG. 9B and at col. 17:58-62, 18:1-18, 18:26-32, 19:34-67

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