EXHIBIT B: 10 MOST IMPORTANT DISPUTED TERMS IDENTIFIED BY THE PARTIES

No.	Term	Plaintiffs' Proposed Construction and Support	Defendants' Proposed Construction and Support
1	**scalable message** '492 patent, claims 1, 8, 14, 19, 25 '893 patent, claims 1, 17, 37 Defendants submit that the term **"scalable"** should be construed, including "scalable message" as well as "scalable byte segments" ('893 patent, claim 3 and '492 patent, claims 4, 21) and "scalable field" ('492 patent, claim 2).	**"a message in which the size of the message can be varied"** Intrinsic support: '492 patent, 9:59-10:4; 11:17-29; 12:48-13:60 '893 patent, 3:27-34; 10:32-45; 11:66-12:13; 13:34-14:48 Extrinsic support: Court's construction from SIPCO, LLC. v. ABB, Inc., CA 6:11-cv-0048 LED-JDL (E.D. Tex.), Memorandum Opinion and Order (Document 255) Court's construction from SIPCO, LLC v. Amazon.com, Inc., CA No. 2:08-cv-359-JRG, Memorandum Opinion and Order (Document 562) Expert Testimony re understanding of this term by a POSA. See Exhibit D.	Scalable: "**varying in size based on the size and complexity of the system**" Scalable message: "**a message that has a variable size based on the size and complexity of the system**" Scalable byte segments: "**byte segments that have variable sizes based on the size and complexity of the system**" Scalable field: "**a field that has a variable size based on the size and complexity of the system.**" Intrinsic support: '893 patent – col. 6:39-41, 6:53-56; 10:31-44; 12:3-13; Figs. 7-9; '492 patent – col. 6:10-12, 6:24-26, 9:59-10:4, 11:19-29; Figs. 7-9; Decision Denying Institution of Inter Partes Review in IPR2015-01579, e.g., at 8-10; Decision Denying Request for Rehearing in IPR2015-01579, e.g., at 2-7. Extrinsic support: Bondi, A., "Characteristics of scalability and their impact on performance," Proceedings of the second international workshop on Software and performance - WOSP '00 195 (2000) ("the ability of a system to accommodate an increasing number of elements or objects, to process growing volumes of work gracefully, and/or to be susceptible to

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No.	Term	Plaintiffs' Proposed Construction and Support	Defendants' Proposed Construction and Support
			enlargement.") Definition of "scalable," Microsoft Computer Dictionary at 419 (Third Edition 1997) ("Of or relating to the characteristic of a piece of hardware or software that makes it possible for it to expand to meet future needs."). Definition of "variable-length field," Microsoft Computer Dictionary at 491 (Third Edition 1997) ("In a record, a field that can vary in length according to how much data it contains."). Tanenbaum, Computer Networks, 3rd edition (1996), at Section 5.2.3 ("Flooding"). SIPCO, LLC v. ABB, Inc., et al., 6:11-cv-0048 LED-JDL (E.D. TX) (July 30, 2012) ("an address that has a variable size based on the size and complexity of the system"); ("message in which the size of the message can be varied") SIPCO, LLC v. Amazon.com, Inc., et al., 2:08-cv-359-JRG (E.D. TX) (October 19, 2012) ("an address that has a variable size based on the size and complexity of the system"). October 6, 2011 Deposition of David Petite, including but not limited to pg. 85-89; 373-85.

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No.	Term	Plaintiffs' Proposed Construction and Support	Defendants' Proposed Construction and Support
			Drs. Heppe and/or Akl may be asked to provide evidence regarding the scalable recitations. In opining about the meaning, their declarations and testimony may explain how Defendants' proposed constructions are supported by intrinsic evidence, extrinsic evidence, and/or the education and experience of a person of ordinary skill in the art relevant to the patents in suit. Their declarations and testimony may also respond to Plaintiffs' proposed constructions and supporting evidence.
2	**low-power** '842 patent, claims 1, 2, 11, 16, 17 '692 patent, claims 1, 3, 18, 24, 32, 34, 42, 49, 55, 60	**"power having limited transmission range"** Intrinsic support: '842 patent, 2:15-45; 5:65-6:11; 13:55-14:41 '692 patent, 2:34-53; 17:23-18:42 Extrinsic support: Court's construction from SIPCO, LLC. v. ABB, Inc., CA 6:11-cv-0048 LED-JDL (E.D. Tex.), Memorandum Opinion and Order (Document 255) Court's construction from SIPCO, LLC v. Datamatic, Ltd., CA No. 6:09cv532-LED-JDL (E.D. Tex.), Memorandum Opinion and Order	**"Low frequency." Alternatively, indefinite.** Intrinsic support: '692 patent – Fig. 14, col. 16:45-17:11; Request for Reconsideration of Final Office Action at 4-6 (11/9/2001); Appeal Br. at 8-12, 18-19, 21-22 (2/22/2001). '842 patent – col. 5:67-6:3; 9:43-46; 14:15-18. Extrinsic support: SIPCO, LLC v. Datamatic, Ltd., 6:09-cv-532-LED-JDL (E.D. TX) (May 6, 2011) SIPCO, LLC v. ABB, Inc., et al., 6:11-cv-0048 LED-JDL (E.D. TX) (July 30, 2012)

EXHIBIT B: 10 MOST IMPORTANT DISPUTED TERMS IDENTIFIED BY THE PARTIES

No.	Term	Plaintiffs' Proposed Construction and Support	Defendants' Proposed Construction and Support
		(Document No. 161) Expert Testimony re understanding of this term by a POSA. See Exhibit D.	November 3, 2010 Deposition of David Petite, including but not limited to pg. 195-199. Drs. Heppe and/or Akl may be asked to provide evidence regarding the low power recitations. In opining about the meaning or lack thereof, their declarations and testimony may explain how Defendants' proposed constructions are supported by intrinsic evidence, extrinsic evidence, and/or the education and experience of a person of ordinary skill in the art relevant to the patents in suit. Their declarations and testimony may also respond to Plaintiffs' proposed constructions and supporting evidence. In addition, Drs. Heppe and/or Akl may explain that the claimed "low power" recitation, viewed in light of the specification and prosecution history, fails to inform those skilled in the art about the scope of the invention with reasonable certainty, including that the term could be satisfied or not satisfied depending on the particular view of what constitutes "low power," leaving the term to the unpredictable vagaries of any one person's opinion.
3	**wide area network/WAN** '661 patent, claims 1, 2, 3, 5, 6, 7, 8, 9, 12, 13, 14	**No construction necessary.** **Alternatively:** **"A communication network that connects**	**"A communications network that interconnects communication facilities in different parts of a country or are used as a public utility, for**

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No.	Term	Plaintiffs' Proposed Construction and Support	Defendants' Proposed Construction and Support
	'692 patent, claims 1, 9, 10, 11, 12, 13, 14, 18, 19, 20, 32, 35, 36, 37, 38, 42, 45-57 '732 patent, claims 1, 8, 32	**geographically separated areas"** Intrinsic support: '661 patent, 2:42-49; 3:36-45; 4:48-52; 6;20-35; 6:42-53; 7:21-61; 10:13-31; 11:1-31; 11:55-12:60; 13:5-14:16; 14:46-15:2; 16:18-27; 17:16-18:29 '692 patent, 2:34-53; 4:45-46; 6:15-30; 11:1-32; 12:4-23; 17:23-18:42 '732 patent, 1:44-50; 2:53-3:5; 3:18-56; 4:60-64; 6:32-47; 12:16-35; 16:32-41; 17:30-18:43 Extrinsic support: Court's construction from SIPCO, LLC. v. ABB, Inc., CA 6:11-cv-0048 LED-JDL (E.D. Tex.), Memorandum Opinion and Order (Document 255) Court's construction from SIPCO, LLC v. Amazon.com, Inc., CA No. 2:08-cv-359-JRG (E.D. Tex.), Memorandum Opinion and Order (Document 562) Definition of "Wide Area Network," Microsoft Computer Dictionary, Third Edition, 1997 Definition of "Wide Area Network," IBM	**example, the internet. A wide area network is larger than a local area network and a metropolitan area network."** Intrinsic support: '511 patent - Figs. 1, 3, 4, 10, 11; cols. 5:57-6:14; 6:24-43; 9:3-32; 9:53-10:17; 10:50-67; 11:57-12:7; 19:3-20:19; 20:34-62; 21:14-29; 22:1-59; '692 patent - Figs. 1, 2, 4-10, 13, 14; cols. 1:25-31, 2:50-53, 3:35-38, 5:24-40, 6:20-23, 7:51-67, 10:8-11, 11:1-12:23, 12:34-40, 13:13-19, 14:61-66, 16:27-34; '732 patent - Figs. 1, 2, 4-10, 13, 14; cols. 1:44-50, 2:63-3:5, 3:51-56, 5:42-47, 6:32-47, 7:63-8:16, 10:22-25, 11:15-12:35, 12:46-52, 13:23-26, 15:1-5, 16:34-41; '611 patent - Figs. 1, 2, 4-10, 13, 14; cols. 1:34-38, 2:52-3:3; 3:39-44, 5:30-35, 6:20-35 7:48-8:4, 10:9-12, 11:1-12:22, 12:33-39, 13:10-13, 14:56-60, 16:20-27; 4/8/2003 Amendment in '511 patent, p. 21; 1/5/2004 Appeal Brief relating to '511 patent, pp. 11, 17-18, 21, 27, 30-31, 36-37, 40, 46-47, 50; 5/17/2004 Reply Brief relating to '511 patent, pp. 2-4; 8/31/2005 Decision on Appeal relating to '511 patent, p. 9; 3/4/2002 Appeal Brief in Serial No. 09/439,059, p. 3. Extrinsic support: IEEE Std. 802-1990, p. 9 (1990)

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