EXHIBIT C: REMAINING TERMS IN DISPUTE

The numbering of the remaining terms is presented for convenience and does not reflect the parties' views as to the relative importance of the terms. All citations to patent specifications refer to section or column and line numbers and include all figures referenced in the relevant passages cited.

.	Claim Term	Plaintiffs' Proposed Construction/Support	Defendants' Proposed Construction/Support
	client/second node '516 patent, claims 1, 10; '471 patent, claims 2, 3, 4, 6, 7, 8, 10, 11, 12, 14, 16, 17, 18, 19, 20, 21, 22, 31, 32, 33, 34, 35, 36, 40;	**"processing device that communicates with a server/first node over a communications network"** Intrinsic support: '516 patent, Abstract; 1:48-53; 4:39-5:18; 5:28-35; 6:8-25; 8:17-42; 8:51-65; 9:6-25; 10:17-22; 10:31-50; 12:32-36; 16:34-39; '471 patent, Abstract; 1:59-64; 4:35-5:11; 5:21-28; 6:1-17; 8:5-29; 8:38-51; 8:59-9:10; 10:1-8; 10: 21-39; 12:21-25; 16:16-21; Extrinsic Support: Definition of "client," Microsoft Computer Dictionary, Third Edition, 1997 Definition of "node," McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, 1994	**"A node in the network that performs the recited client/second node functions."** Intrinsic support: '062 patent specification, Figs. 4, 5, 5a, 5b, 5c, 6, 6a, 6b, 7, 8, 11, 14, 15, 16, 17, 18, and 20 and associated description; see also Fig. 13 as described at Col. 18, ln. 66 – Col. 19, ln. 22; Figs. 17 and 18 as described at Col. 20, ln. 52 – Col. 21, ln. 27; see also Fig. 18A illustrating a client's data packet as described at Col. 21 ln. 28-46 and Figs. 1a-1b and 2a-2o as described at Col. 9, ln. 59 – Col. 10, ln. 7; see also Decision Granting IPR of '062 patent (2/4/14), p. 3. '062 patent specification, Col. 15, ln 41 (defining the "server" as the "root of the tree"); see also Col. 5, ln. 12-15; Col. 5, ln. 29-32; Col. 9, ln. 45-49; Col. 13, ln. 9-34; and Col. 17, ln. 22-33.

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.	Claim Term	Plaintiffs' Proposed Construction/Support	Defendants' Proposed Construction/Support
		Expert Testimony re understanding of this term by a POSA. See Exhibit D.	Extrinsic Support: Definition of "client," Microsoft Computer Dictionary, Third Edition, 1997 Definition of "server," Microsoft Computer Dictionary, Third Edition, 1997 Drs. Heppe and/or Akl may be asked to provide evidence regarding the client 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	**link to said server/first node** '471 patent, claims 2, 6, 10, 14, 17, 20, 31, 34, 40; '496 patent, claims 1, 2, 7, 11, 12, 16, 21, 24, 33, 40, 42, 45;	**"a path from a client to the server/first node"** <u>Intrinsic support:</u>	**"The 'link' includes the identification of each of the hops to be traversed by the data message packet en route to the first node (server)."**

EXHIBIT C: REMAINING TERMS IN DISPUTE

.	Claim Term	Plaintiffs' Proposed Construction/Support	Defendants' Proposed Construction/Support
		'471 patent, 2:34-43; 4:60-5:43; 6:11-17; 7:50-9:10; 9:21-12:40; 13:26-14:29; 19:47-20:59; 20:60-21:26; '496 patent, 2:37-46; 4:63-5:46; 6:14-20; 7:52-9:12; 9:23-12:42; 13:28-14:31; 19:49-20:61; 20:62-21:27; Extrinsic Support: Definition of "server," McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, 1994 Definition of "node," McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, 1994 Expert Testimony re understanding of this term by a POSA. See Exhibit D.	Intrinsic support: '062 patent specification, Col. 5, ln. 23-24; 8/5/99 Office Action Response, p. 5 (emphasizing that each client must communication through a transmission path that includes all other clients); '062 patent reexamination, Response to First Office Action (1/22/08), pp. 4, 7 and 10. '062 patent Reexam Appeal Brief at 34 (link tree includes identification of "all of the clients on the path"); '062 IPR Grant of Petition at p. 3 (defining client machines as a personal computer); see also, '314 IPR proceedings, Patent Owner's Preliminary Response, pp. 9-12, 20-23 (transmission path includes "all the nodes along the path from the client to the server"); and '516 patent reexamination 10/29/07Office Action Response, pp. 9-24 and declaration of Brownrigg in support thereof, paragraph 15-25. *See also* Patent Owner's response to IPR petition filed for the '314 patent; Oct. 14, 2008 Proposed After Final Amendment in '062 patent reexamination and associated

EXHIBIT C: REMAINING TERMS IN DISPUTE

.	Claim Term	Plaintiffs' Proposed Construction/Support	Defendants' Proposed Construction/Support
			Advisory Action (Dec. 16, 2008).
			Extrinsic Support:
			November 17, 2005 Deposition of Edwin Brownrigg, including but not limited to pgs. 149-54; 190-93.
			March 29, 2006 Deposition of Edwin Brownrigg, including but not limited to pgs. 150-60; 171-75; 190-92; 196-97.
			June 18, 2013 Deposition of Edwin Brownrigg, including but not limited to pgs. 111-114; 119; 124; 131.
			Drs. Heppe and/or Akl may be asked to provide evidence regarding the link 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

EXHIBIT C: REMAINING TERMS IN DISPUTE

.	Claim Term	Plaintiffs' Proposed Construction/Support	Defendants' Proposed Construction/Support
			supporting evidence.
	[changes the/changing] transmission paths of [clients/each of the second nodes] '314 patent, claim 12; '516 patent, claims 1, 10;	**No construction necessary.** Intrinsic support: '314 patent, 4:26-35; 5:55-61; 6:9-10; 8:44-9:2; 9:12-21; 9:12-21; 9:44-51; 10:63-11:5; 11:39-12:16; 14:50-16:32; '516 patent, 4:39-48; 6:2-7; 6:23-25; 8:66-9:5; 9:6-25; 9:35-40; 9:42-45; 10:1-9; 11:14-11:26; 11:58-12:36; 15:6-16:58; 16:20-33; Extrinsic Support: Definition of "node," McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, 1994 Expert Testimony re understanding of this term by a POSA. See Exhibit D.	**This term requires construction under 112(f).** **Function: updating the map of transmission paths to reflect route updates made by a client.** **Structure: Microprocessor 42 implementing algorithms of Fig. 5 (esp. at 86, 88, and 90) and Fig. 18 (esp. at 388 and 392) and corresponding discussion in specification.** **Alternatively, specification lacks an adequate written description of structure for performing the recited functions** Intrinsic support: *See* '062 patent specification, col. 5, ln. 23-24; algorithms of Fig. 5 (esp. at 86, 88, and 90) and Fig. 18 (esp. at 388 and 392) and corresponding discussion in specification; *see also* Col. 13, ln. 9-27; Col. 9, ln. 44-66 (tree structures); Fig. 4 as described

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