

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HID GLOBAL CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 21-1769 (GBW)
	)	(CONSOLIDATED)
VECTOR FLOW, INC.,	)	
	)	
Defendant.	)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 11 of the Scheduling Order (D.I. 54) and the parties’ subsequent stipulation (D.I. 73), the parties hereby submit their Joint Claim Construction Chart (Ex. A) for U.S. Patent Nos. 8,234,704 (“the ’704 Patent”) and 9,111,088 (“the ’088 Patent”) (collectively, the “Asserted Patents”). This chart identifies the disputed claim terms, the parties’ proposed constructions of those terms, and supporting intrinsic evidence. Citations to patent column and line numbers are in column:line format.

Each party reserves the right to rely on portions of the intrinsic record not cited in the Joint Claim Construction Chart, including to refute positions taken by the other party during the *Markman* proceedings. Additionally, each party reserves the right to introduce extrinsic evidence to the extent the Court permits such evidence.

The citation to any portion of the intrinsic record is not to be construed as an admission by that party that the cited portion defines the term. Moreover, the parties further agree that any party may argue that the cited portions are exemplary.

Copies of the following are attached as Exhibits:

Exhibit A: Joint Claim Construction Chart

Exhibit B: '704 Patent

Exhibit C: '088 Patent

Exhibit D: '704 Patent Provisional Application No. 60/837,755 ("the '755 App.")

Exhibit E: '088 Patent Provisional Application No. 60/837,754 ("the '754 App.")

Exhibit F: '704 Patent Non-Final Rejection (Oct. 4, 2010)

Exhibit G: '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011)

Exhibit H: '704 Patent Final Rejection (Apr. 19, 2011)

Exhibit I: '704 Patent Applicant Amendment & Resp. (Oct. 19, 2011)

Exhibit J: '704 Patent Applicant Amendment & Resp. (Nov. 11, 2011)

Exhibit K: '704 Patent Notice of Allowance (May 17, 2012)

Exhibit L: '088 Patent Applicant Amendment & Resp. (July 19, 2011)

Exhibit M: '088 Patent Applicant Amendment & Resp. (Mar. 6, 2012)¹

Exhibit N: '088 Patent Applicant Amendment & Resp. (Dec. 19, 2012)

Exhibit O: '088 Patent Non-Final Rejection (Mar. 20, 2014)

Exhibit P: '088 Patent Applicant Amendment & Resp. (Aug. 20, 2014)

Exhibit Q: '088 Patent Final Rejection (Oct. 20, 2014)

Exhibit R: '088 Patent Applicant Amendment & Resp. (Apr. 20, 2015)

¹ The date listed on this exhibit, March 6, 2011, is a typographical error. Applicant filed this paper with the Patent Office on March 6, 2012.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jennifer Ying

Jack B. Blumenfeld (#1014)
Jennifer Ying (#5550)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
jying@morrisnichols.com

OF COUNSEL:

Marc J. Pensabene
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, NY 10036
(212) 326-2000

David R. Eberhart
Sorin G. Zaharia
Betelhem Gedlu
O'MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
(415) 984-8700

Eric Amdursky
O'MELVENY & MYERS LLP
2765 Sand Hill Road
Menlo Park, CA 94025
(650) 473-2600

*Attorneys for Plaintiff HID Global
Corporation*

October 13, 2022

RICHARDS LAYTON & FINGER, P.A.

/s/ Kelly E. Farnan

Kelly E. Farnan (#4395)
Nicole K. Pedi (#6236)
One Rodney Square
920 North King Street
Wilmington, DE 19801
(302) 651-7700
farnan@rlf.com
pedi@rlf.com

OF COUNSEL:

Adam S. Gershenson
Julianne Landsvik
COOLEY LLP
500 Boylston Street, 14th Floor
Boston, MA 02116-3736
(617) 937-2300

Heidi Keefe
Lowell Mead
Mark Weinstein
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
(650) 843-5000

Angeline X. Chen
COOLEY LLP
55 Hudson Yards
New York, NY 10001-2157
(212) 479-6000

*Attorneys for Defendants Vector Flow, Inc.,
Ajay Jain, Vikrant Ghai, and Shailendra
Sharma*

Exhibit A: Joint Claim Construction Chart for U.S. Patent Nos. 8,234,704 (“the ’704 Patent”) and 9,111,088 (“the ’088 Patent”)**Agreed-Upon Constructions:**

None.

Disputed Constructions:

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic Evidence	Defendants’ Proposed Construction	Defendants’ Intrinsic Evidence
1	“sensor”	’704 Patent: cls. 11-15 ’088 Patent: cl. 15	plain and ordinary meaning	’704 Patent (Ex. B) at cls. 1-3, 6-15; 1:31-52, 2:31-52, 4:3-39, 4:64- 5:1, 9:59-10:14, 10:57- 64, 11:51-12:10, 12:26- 50; Figs. 1A, 1B, 3-6 ’755 App. (Ex. D) at 4, 14; Figs. 1-3 ’704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G) ’704 Patent Notice of Allowance (May 17, 2012) (Ex. K) ’088 Patent (Ex. C) at cls. 1, 6-9, 14, 15, 20; 1:30-50, 2:26-31, 2:60- 3:16, 4:22-44, 5:10-20, 11:49-67, 12:20-27, 13:17-42, 13:28-14:22; Figs. 1-6B	“a device that responds to a physical stimulus and transmits a resulting signal”	’704 (Ex. B), Figs. 1, 4, 5, ’704 (Ex. B), 1:31-52 ’704 (Ex. B), 4:3-25 ’704 (Ex. B), 10:57-64 ’704 (Ex. B), 11:63- 12:6 ’088 (Ex. C), Figs. 1, 3, 4, 5 ’088 (Ex. C), 1:30-50 ’088 (Ex. C), 2:26-32 ’088 (Ex. C), 4:22-44 ’088 (Ex. C), 5:10-20 ’088 (Ex. C), 12:20-27 ’088 (Ex. C), 13:17-31 ’088 (Ex. C), 14:17-22

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				'754 App. (Ex. E) at 4; Figs. 1, 2 '088 Patent Applicant Amendment & Resp. (Apr. 20, 2015) (Ex. R)		
2	"sensor data"	'704 Patent: cls. 11, 13	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1-3, 6-15; 1:31-52, 2:31-52, 4:3-39, 4:64-5:1, 7:37-54, 9:59-10:14, 10:57-64, 11:51-12:10, 12:26-50; Figs. 1A, 1B, 3-6 '755 App. (Ex. D) at 4, 13, 14; Figs. 1-3 '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G) '704 Patent Notice of Allowance (May 17, 2012) (Ex. K)	"the data transmitted by a sensor in response to a physical stimulus"	'704 (Ex. B), Fig. 5 '704 (Ex. B), 11:63-12:6 '704 FH: 2010-10-04 Non-Final Rejection (Ex. F); 2011-01-27 Applicant Remarks (Ex. G); 2012-05-17 Notice of Allowance (Ex. K)
3	"native data representation format"	'704 Patent: cls. 11, 13	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1-3, 6-15; 1:31-52, 2:31-52, 4:3-39, 4:64-5:1, 7:37-54, 9:59-	"the original format of the data transmitted by a sensor in response to a	'704 (Ex. B), Figs. 1-6 '704 (Ex. B), 3:14-36 '704 (Ex. B), 4:40-5:5

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				10:14, 10:57-64, 11:51-12:10, 12:26-50; Figs. 1A, 1B, 3-6 '755 App. (Ex. D) at 4, 13, 14; Figs. 1-3 '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G) '704 Patent Notice of Allowance (May 17, 2012) (Ex. K)	physical stimulus"	'704 (Ex. B), 7:37-54 '704 (Ex. B), 8:49-9:40 '704 (Ex. B), 9:59-10:23 '704 (Ex. B), 10:44-56 '704 (Ex. B), 11:52-12:10 '704 (Ex. B), 12:26-50 '704 FH: 2010-10-04 Non-Final Rejection (Ex. F); 2011-01-27 Applicant Remarks at 8-9 (Ex. G); 2011-04-19 Final Rejection at 7-8, 11-14 (Ex. H); 2011-10-19 Applicant Remarks at 11-12 (Ex. I); 2012-05-17 Notice of Allowance (Ex. K)
4	"integration module"	'704 Patent: cl. 11	plain and ordinary meaning; not indefinite	'704 Patent (Ex. B) (throughout) '755 App. (Ex. D) (throughout)	Indefinite	'704 (Ex. B), Figs. 3, 4, 6 '704 (Ex. B), 3:14-43 '704 (Ex. B), 6:10-31

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				'704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G)		'704 (Ex. B), 6:51-64 '704 (Ex. B), 7:37-53 '704 (Ex. B), 8:29 '704 (Ex. B), 12:26-54
5	"individual user profiles"	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 5:1-23, 13:31-52, 18:29-39 '755 App. (Ex. D) at 3, 8 '704 Patent Notice of Allowance (May 17, 2012) (Ex. K)	"a profile corresponding to an individual user"	'704 (Ex. B), 1:31-52 '704 (Ex. B), 4:58-5:23 '704 (Ex. B), 13:31-52 '704 (Ex. B), 18:19-38 '704 FH: 2011-04-19 Final Rejection (Ex. H), 2011-10-19 Applicant Arguments (Ex. I), 2011-11-11 Claims (Ex. J)
6	"common data representation format"	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 2:31-33, 6:51-55, 7:37-54; Fig. 1A '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G)	"a data format that can be used by applications, rules engines and other standard software components, while still maintaining communication to the respective physical security systems,	'704 (Ex. B), Figs. 1-6 '704 (Ex. B), 2:11-13 '704 (Ex. B), 6:51-55 '704 (Ex. B), 7:37-54 '704 (Ex. B), 9:59-

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				'704 Patent Notice of Allowance (May 17, 2012) (Ex. K)	applications and devices in their native, proprietary format"	10:23 '704 (Ex. B), 11:52-12:10 '704 (Ex. B), 12:26-5- '704 FH, 2011-01-27 Applicant Arguments, at 8-10 (Ex. G); 2011-04-19 Final Rejection at 7-14 (Ex. H); 2011-10-19 Applicant Arguments at 10-12 (Ex. I)
7	"policy" / "policies"	'704 Patent: cl. 11 '088 Patent: cls. 15-17, 19	plain and ordinary meaning	'704 Patent (Ex. B) (throughout) '755 App. (Ex. D) (throughout) '704 Patent Applicant Amendment & Resp. (Oct. 19, 2011) (Ex. I) '088 Patent (Ex. C) (throughout) '754 App. (Ex. E) (throughout) '088 Patent Applicant	"a user-defined logical entity that acts as a container for rules that are contained in the policy definition and allows easy grouping of rules in order to understand, view, enable and order them as one group"	'704 (Ex. B), Figs. 3-5, 7, 10, 11 '704 (Ex. B), 7:55-9:57 '704 (Ex. B), 10:24-43 '704 (Ex. B), 11:40-51 '704 (Ex. B), 13:18-14:58 '704 (Ex. B), 15:48-16:32 '088 (Ex. C) Figs. 3-

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				Amendment & Resp. (Mar. 6, 2012) (Ex. M) '088 Patent Applicant Amendment & Resp. (Dec. 19, 2012) (Ex. N)		12 '088 (Ex. C), 13:5-16 '088 (Ex. C), 18:30-22:53
8	"rule" / "rules"	'704 Patent: cl. 11, 14, 15 '088 Patent: cls. 15-17	plain and ordinary meaning	'704 Patent (Ex. B) (throughout) '755 App. (Ex. D) (throughout) '088 Patent (Ex. C) (throughout) '754 App. (Ex. E) (throughout)	"the actual lowest level combination of Condition-Action that is applied to the data objects processed by the system"	'704 (Ex. B), Figs. 1, 5, 7, 9, 11 '704 (Ex. B), 3:14-43 '704 (Ex. B), 5:24-42 '704 (Ex. B), 7:55-8:28 '704 (Ex. B), 9:11-12:10 '704 (Ex. B), 11:48-50 '704 (Ex. B), 13:18-16:32 '704 (Ex. B), 16:34-18:7 '088 (Ex. C), Figs. 1, 5, 7, 8, 9, 11, 12 '088 (Ex. C), 5:42-60 '088 (Ex. C), 8:28-47 '088 (Ex. C), 10:5-60

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
						'088 (Ex. C), 12:20-14:52 '088 (Ex. C), 19:8-22:53 '088 (Ex. C), 22:55-25:24 '088 (Ex. C), 13:13-15
9	“visual rules”	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at Abstract, cls. 1, 6, 11; 2:53-67, 3:14-43, 10:57-11:20, 16:33-42, 16:65-17:11, 17:22-54, 17:64-18:7; Figs. 7, 9, 11 '755 App. (Ex. D) at 3-5	“a rule that is visually defined and depicted in a display area by placing icons and connectors in appropriate relationships to one another”	'704 (Ex. B), Figs. 4, 7-12 '704 (Ex. B), abstract '704 (Ex. B), 2:18-24 '704 (Ex. B), 3:20-43 '704 (Ex. B), 10:64-11:14 '704 (Ex. B), 16:34-18:7 '704 (Ex. B), 17:25-27 '704 FH, 2011-04-19 Final Rejection (Ex. H); 2011-10-19 Claim Amendments (Ex. I); 2011-10-19 Applicant Arguments at 9-12 (Ex. I)

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
10	"live objects"	'704 Patent: cl. 11	plain and ordinary meaning; "stencil objects"	'704 Patent (Ex. B) at Abstract; cls. 1, 6, 11; 2:53-67, 3:14-43, 5:24-26, 10:24-27, 10:64-66, 11:10-17, 15:32-47, 16:33-53, 16:65-18:7; Figs. 1A, 4, 7-11 '755 App. (Ex. D) at Fig. 2	"stencil shapes that are used to represent normalized systems, data and processes"	'704 (Ex. B), Figs. 4, 7, 8, 9, 12 '704 (Ex. B), 3:14-43 '704 (Ex. B), 10:64-11:17 '704 (Ex. B), 17:12-18:7 '704 FH, 2011-04-19 Final Rejection (Ex. H); 2011-10-19 Claim Amendments (Ex. I); 2011-10-19 Applicant Arguments at 9-12 (Ex. I)
11	"actionable representations"	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at Abstract; cls. 1, 6, 11, 2:31-49, 3:14-36, 5:26-42, 6:51-58, 8:19-23, 9:11-40, 10:24-56, 11:52-60, 16:33-42; Figs. 1A, 3-5 '755 App. (Ex. D) at 3-7, 12-14; Figs. 1, 2	"a visual representation of actionable events that are defined in a visual policy engine for rules execution"	'704 (Ex. B), Fig. 4, 5, '704 (Ex. B), 3:14-36, '704 (Ex. B), 10:24-56 '704 (Ex. B), 16:34-42 '704 FH, 2011-04-19 Final Rejection (Ex. H); 2011-10-19 Claim Amendments (Ex. I); 2011-10-19 Applicant

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
						Arguments at 9-12 (Ex. I)
12	"spatial relationship"	'704 Patent: cls. 11, 15	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 10, 11, 15; 2:31-33, 5:1-10, 10:57-11:14, 18:19-38; Fig. 1A '755 App. (Ex. D) at 3, 8 '704 Patent Notice of Allowance (May 17, 2012) (Ex. K)	"relationship in physical space"	'704 (Ex. B), 5:5-10. '704 (Ex. B), 10:57-11:14 '704 (Ex. B), 18:26-38
13	"routing rules"	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 2:40-45, 9:11-28, 10:44-56; Figs. 3, 4 '755 App. (Ex. D) at 12; Figs. 1, 2 '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G) '704 Patent Applicant Amendment & Resp. (Oct. 19, 2011) (Ex. I) '704 Patent Applicant	"a rule that controls the flow of data between different connected systems"	'704 (Ex. B), Figs. 3, 4 '704 (Ex. B), 9:15-28 '704 (Ex. B), 10:44-56 '704 FH, 2010-10-04 Non-Final Rejection (Ex. F), 2011-01-27 Applicant Arguments at 8-10 (Ex. G); 2011-04-19 Final Rejection (Ex. H); 2011-10-19 Claim Amendments (Ex. I); 2011-10-19 Applicant Arguments

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				Amendment & Resp. (Nov. 11, 2011) (Ex. J)		at 9-12 (Ex. I).
14	"transformation rules"	'704 Patent: cl. 11	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 2:40-45, 9:11-28, 10:44-56; Figs. 3, 4 '755 App. (Ex. D) at 12; Figs. 1, 2 '704 Patent Applicant Amendment & Resp. (Jan. 27, 2011) (Ex. G) '704 Patent Applicant Amendment & Resp. (Oct. 19, 2011) (Ex. I) '704 Patent Applicant Amendment & Resp. (Nov. 11, 2011) (Ex. J)	"a rule that defines and maintains the transformational mapping of data and events between different connected systems"	'704 (Ex. B), Figs. 3, 4 '704 (Ex. B), 7:55-8:8 '704 (Ex. B), 9:15-28. '704 (Ex. B), 10:44-56 '704 FH, 2010-10-04 Non-Final Rejection (Ex. F), 2011-01-27 Applicant Arguments at 8-10 (Ex. G); 2011-04-19 Final Rejection (Ex. H); 2011-10-19 Claim Amendments (Ex. I); 2011-10-19 Applicant Arguments at 9-12 (Ex. I).
15	"physical security"	'704 Patent: cl. 11 '088 Patent: cls. 15, 16	plain and ordinary meaning	'704 Patent (Ex. B) (throughout) '755 App. (Ex. D) (throughout) '088 Patent (Ex. C) (throughout)	"security of a physical site"	'704 (Ex. B), Figs. 1, 3, 5, 7, 8, 12 '704 (Ex. B), 1:31-2:14 '704 (Ex. B), 4:1-32 '704 (Ex. B), 5:5-10

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				'754 App. (Ex. E) (throughout)		'704 (Ex. B), 12:26-50 '704 (Ex. B), 18:26-38 '088 (Ex. C), Figs. 1, 3, 4, 5, 7, 8, 9, 12 '088 (Ex. C), 1:30-2:8 '088 (Ex. C), 3:44-62 '088 (Ex. C), 4:25-34 '088 (Ex. C), 5:16-29 '088 (Ex. C), 11:42-48
16	"physical security state" / "physical security states"	'704 Patent: cl. 11 '088 Patent: cls. 15, 16	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 2:40-45, 3:37-43, 9:11-40, 10:24-56; Figs. 3, 4 '755 App. (Ex. D) at 12-14; Figs. 1, 2 '088 Patent (Ex. C) at Abstract; cls. 1, 2, 6, 15, 16; 2:9-53, 2:65-3:7, 3:44-62; 9:1-11:3, 11:19-41, 19:8-26, 24:62-25:24; Figs. 2-4 '754 App. (Ex. E) (throughout)	"information describing the status of physical security access and events"	'704 (Ex. B), Figs. 3, 4 '704 (Ex. B), 3:37-43 '704 (Ex. B), 8:54-56 '704 (Ex. B), 9:11-40 '704 (Ex. B), 10:44-56 '088 (Ex. C), Figs. 3, 4 '088 (Ex. C), 2:2:15-25 '088 (Ex. C), 9:14-61 '088 (Ex. C), 10:54-60

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
						'088 (Ex. C), 11:22-27
17	"security state" / "security states"	'704 Patent: cl. 11 '088 Patent: cls. 15, 16	plain and ordinary meaning	'704 Patent (Ex. B) at cls. 1, 6, 11; 2:40-45, 3:37-43, 9:11-40, 10:24- 56; Figs. 3, 4 '755 App. (Ex. D) at 12- 14; Figs. 1, 2 '088 Patent (Ex. C) at Abstract; cls. 1, 2, 6, 15, 16, 2:9-53, 2:65-3:7, 3:44-62; 9:1-11:3, 11:19-41, 19:8-26, 24:62-25:24; Figs. 2-4 '754 App. (Ex. E) (throughout)	"information describing the status of security access and events"	'704 (Ex. B), Figs. 3, 4, '704 (Ex. B), 3:37-43 '704 (Ex. B), 8:54-56 '704 (Ex. B), 9:11-40 '704 (Ex. B), 10:44-56 '088 (Ex. C), Figs. 3, 4 '088 (Ex. C), 2:2:15- 25 '088 (Ex. C), 9:14-61 '088 (Ex. C), 10:54-60 '088 (Ex. C), 11:22-27
18	"single integration layer component"	'088 Patent: cl. 15	plain and ordinary meaning; not indefinite	'088 Patent (Ex. C) (throughout) '754 App. (Ex. E) (throughout) '088 Patent Applicant Amendment & Resp.	Indefinite.	'704 (Ex. B), Fig. 6 '704 (Ex. B), 6:26-31 '704 (Ex. B), 7:37-53 '704 (Ex. B), 10:2-14 '088 (Ex. C), 6:45-50

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				(Apr. 20, 2015) (Ex. R)		'088 (Ex. C), 7:55-8:5. '088 (Ex. C), 11:61-66 '088 (Ex. C), 15:44-56
19	"protocol defined trap message"	'088 Patent: cl. 15	plain and ordinary meaning	'088 Patent (Ex. C) at cls. 1, 6, 15; 3:4-16, 12:10-19, 14:23-15:8, 15:61-16:14; Figs. 4, 6B '754 App. (Ex. E) at Fig. 2 '088 Patent Applicant Amendment & Resp. (Apr. 20, 2015) (Ex. R)	"an unsolicited alert message defined by Simple Network Management Protocol"	'088 (Ex. C), 14:23-44 '088 (Ex. C), 15:61-14 '088 FH: 2014-03-20 Non-Final Rejection (Ex. O); 2014-08-20 Claims (Ex. P); 2014-08-20 Applicant Arguments at 11-14 (Ex. P); 2014-10-20 Final Rejection (Ex. Q); 2015-04-20 Applicant Arguments at 11-14 (Ex. R).
20	"system log daemon"	'088 Patent: cl. 15	plain and ordinary meaning	'088 Patent (Ex. C) at cls. 1, 6, 15; 14:53-15:8, 16:15-43 '088 Patent Applicant Amendment & Resp. (Apr. 20, 2015) (Ex. R)	"a server process that provides a message logging facility for systems"	'088 (Ex. C), 16:16-44 '088 FH: 2014-03-20 Non-Final Rejection (Ex. O); 2014-08-20 Claims (Ex. P); 2014-08-20 Applicant

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
						Arguments at 11-14 (Ex. P); 2014-10-20 Final Rejection (Ex. Q); 2015-04-20 Applicant Arguments at 11-14 (Ex. R).
21	"build a continually updated security state"	'088 Patent: cl. 15	plain and ordinary meaning	'088 Patent (Ex. C) at cls. 1, 2, 6, 15; 2:65-3:3, 9:25-10:44, 24:62-25:7; Figs. 2, 3 '754 App. (Ex. E) at 3, 7, 10; Fig. 1 '088 Patent Applicant Amendment & Resp. (Aug. 20, 2014) (Ex. P) '088 Patent Applicant Amendment & Resp. (Apr. 20, 2015) (Ex. R)	"proactively building the security state of a deployed and interconnected system by maintaining and continually updating the state of the system through normalized sensor data and executable rules"	'088 FH, 2015-04-20 Applicant Arguments at 12 (Ex. R).
22	"physical security state engine"	'088 Patent: cl. 15	plain and ordinary meaning	'088 Patent (Ex. C) at Abstract; cls. 1, 2, 6, 15, 16, 2:9-53, 2:65-3:7, 3:44-62; 9:1-11:3, 11:19-41, 19:8-26, 24:62-25:24; Figs. 2-4	"A real-time, high speed repository and access interface to all the security states defined in the system"	'088 (Ex. C), Fig. 4 '088 (Ex. C), 10:54-60. '088 (Ex. C), 11:30-41

No.	Claim Term or Phrase	Asserted Claim(s)	Plaintiff's Proposed Construction	Plaintiff's Intrinsic Evidence	Defendants' Proposed Construction	Defendants' Intrinsic Evidence
				'754 App. (Ex. E) (throughout)		
23	"virtual objects"	'088 Patent: cls. 15, 16	plain and ordinary meaning; not indefinite	'088 Patent (Ex. C) (throughout) '754 App. (Ex. E) (throughout) '088 Patent Applicant Amendment & Resp. (July 19, 2011) (Ex. L)	Indefinite; "a visual depiction of an object that is not real"	'088 (Ex. C), Figs. 7-12
24	"reference" / "references"	'088 Patent: cl. 15	plain and ordinary meaning; not indefinite	'088 Patent (Ex. C) at cls. 1, 6, 15; 3:4-19, 12:20-13:4, 21:1-10, 21:34-51; Figs. 4, 7 '754 App. (Ex. E) at Fig. 2	"a shape used to create references for lookups for information"	'088 (Ex. C), 12:20-61 '088 (Ex. C), 21:1-51