

Previous Constructions of Claim Terms of the '541 Patent

| Claim Term | Relevant Claims | RSA Brief | RSA Order | JP Morgan Order | Merrill Order |
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| "coding" | '541 claims 1,6,13,14, 20,28,32,35, 38,46,41,51, 54. | "transforming information from one form to another." See RSA Brief at 16. | "transforming information by applying a known algorithm." See RSA Order at 4. | "transforming information by applying a known algorithm." See JP Morgan Order at 6. | "transforming information by applying a known algorithm." See Merrill Order at 19. |
| "credential" | '541 claims 14,15,16,19, 20,21,22,26, 28,31,32,34, 35,37,38,40, 41,42,43,45, 46,47,48,50, 51,52. | "a document or information obtained from a trusted source that is transferred or presented to establish the identity of a party." See RSA Brief at 19. | "a document or information obtained from a trusted source that is transferred or presented to establish the identity of a party." See RSA Order at 6. | "a document or information obtained from a trusted source that is transferred or presented for purposes of determining the identity of a party." See JP Morgan Order at 22. | "a document or information obtained from a trusted source that is transferred or presented for purposes of determining identity of a party." See Merrill Order Brief at 11. |
| "credential information" | '541 claims 14,15,19,20, 21,26,28,31, 32,34,35,37, 38,40,41,42, 45,46,47,51. | | | "information stored or contained in a credential." See JP Morgan Order at 6. | |

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| “Variable Authentication Number (VAN)” | ‘541 claims 6,13,14,20, 28,38,32,35, 41,46,51. | “a variable number that can be used in verifying the identity of a party or the integrity of information or both.” See RSA Brief at 22. | “a variable number that can be used in identifying the identity of a party or the integrity of information or both.”). See RSA Order at 2. | “an encoded variable number that can be used in verifying the identity of a party or the integrity of information or both.” See JP Morgan Order at 13. | “an encoded variable number that can be used in verifying the identity of a apart or the integrity of information or both.” See Merrill Order Brief at 10. |
| “previously issued” | ‘541 claims 14,20,28,32, 35,38,41,46, 51. | “the credential is issued prior to the transaction.” See RSA Brief at 24. | “the credential referenced in the claim must already be issued before the execution of the steps recited in the claim.” See RSA Order at 5. | “issued before the execution of the steps recited in the claim.” See JP Morgan Order at 24. | “issued before the execution of the steps recited in the claim.” See Merrill Order Brief at 20. |

| Claim Term | Relevant Claims | Merrill Brief | Merrill Defendants' Construction | Amazon Brief | Amazon Defendants' Construction | Amazon Order |
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| "coding" | '541 claims 1,6,13,14 20,28,32, 35,38,46, 41,51,54. | "transforming information by applying a known algorithm." See Merrill Brief at 30. | <u>Coding (or Encoding) a VAN:</u> "transforming information into a VAN by applying a known algorithm under which the resulting VAN can either be uncoded by reversing the coding operation or compared to a VAN regenerated by applying that same known algorithm to the information." See Merrill Brief at 29. | "transforming information by applying a known algorithm." See Amazon Brief at 11. | "transforming original information into coded information by applying a known algorithm but excluding transforming coded information back into its original state." See Amazon Brief at 6. | "transforming original information into coded information by applying a known algorithm but excluding transforming coded information back into its original state." See Amazon Order at 18. |
| "credential" | '541 claims 14,15,16 19,20,21 22,26,28 31,32,34 35,37,38 40,41,42 43,45,46 47,48,50 51,52. | "a non-secret document or information obtained from a trusted source that is transferred or presented for purposes of determining the identity of a party." See Merrill Opening Brief at 13. | "a document or thing obtained from a trusted source that establishes the identity of a party when it is transferred or presented." See Merrill Brief at 13. | "a non-secret document or information obtained from a trusted source that is transferred or presented for purposes of determining the identity of a party." See Amazon Brief at 23. | "a document or thing obtained from a trusted source that establishes the identity of a party when it is transferred or presented." See Amazon Brief at 23. | a document or information obtained from a trusted source that is transferred or presented for purposes of determining the identity of a party. See Amazon Order at 35. |
| "credential Information" | '541 claims 14,15,19 | | | | | |

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| | 20,21,26, 28,31,32, 34,35,37, 38,40,41, 42,45,46, 47,51. | | | | | |
| “Variable Authentication Number” (VAN) | ‘541 claims 6,13,14, 20,28,38 32,35,41 46,51. | “a variable number that can be used in verifying the identity of a party or the integrity of information or both, the value generated by [coding] information associated with or related to a transaction, document, or thing with either a joint key or information associated with or assigned or related to at least one party to the transaction or issuance of the document or thing.” See Merrill Opening Brief at 13. | “a variable number that can be used by a recipient to verify the integrity of information relevant to the transaction <u>and</u> that a party to the transaction originated the transaction information, the value generated by [coding] information relevant to the transaction either with a joint code produced from information associated with the party or directly with information associated with at least one party.” See Merrill Opening Brief at 13. | “an encoded variable number that can be used in verifying the identity of a party or the integrity of information or both, the number generated by coding information relevant to a transaction, document, or thing with either a joint key or information associated with or assigned or related to at least one party to the transaction or issuance of the document or thing.” See Amazon Brief at 14. | “an encoded variable number constructed to allow verification that information is not fraudulent.” See Amazon Brief at 14. | affirmed Stambler I court construction: “an encoded variable number that can be used in verifying the identity of a party or the integrity of information or both.” See Amazon Order at 25. |
| “previously issued” | ‘541 claims 14,20,28, 32,35,38, | | | | | “issued before the execution of the steps recited in the |

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| | 41,46,51. | | | | | claim.” See Amazon Order at 39. |
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