

Exhibit 2

EXHIBIT 2
PARTIES' PROPOSED CONSTRUCTIONS OF DISPUTED CLAIM TERMS AND SUPPORTING EVIDENCE

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
1.	packet transformation function/functions	'205 Patent, Claims 17, 33	<p>“function that transforms one or more packets from one state to another”</p> <p><u>Intrinsic Evidence:</u> '205 Patent Specification Abstract; Claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95; Col. 2, ll. 36-40, 52-56; Col. 6, ll. 56-67; Col. 7, ll. 1-36; Col. 9, ll. 44-52, 59-67; Col. 10, ll. 1-17, 29-46, 66-67; Col. 11, ll. 1-30; Col. 14, ll. 52-59, 66-67; Col. 15, ll. 1-3, 18-42; Col. 20, ll. 52-53; Col. 23, ll. 11-13; Col. 25, ll. 40-42.</p> <p><u>Extrinsic Evidence:</u> Opening Declaration of</p>	<p>“an operation performed on a packet specified by the dynamic security policy, such as forward or drop”</p> <p><u>Intrinsic Evidence:</u> '205 patent, claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95. '205 patent at Abstract, 2:36-40, 2:45-56, 5:58-62, 6:56-7:36.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Dr. Nenad Medvidovic ¶¶ 14-15. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 17-18.	
2.	packet transformation function	'213 Patent Claims 1, 3	<p>“function that transforms one or more packets from one state to another”</p> <p><u>Intrinsic Evidence:</u></p> <p>'213 Patent Title; Abstract; Figs. 2-4, 10-12; Claims 1-15; Col. 1, ll. 31-63; Col. 2, ll. 27-67; Col. 3, ll. 1-34; Col. 4, ll. 1-10, 14-65; Col. 5, ll. 21-56; Col. 6, ll. 1-58; Col. 7, ll. 1-67; Col. 8, ll. 1-52, 55-67; Col. 9, ll. 1-9; Col. 10, ll. 4-67; Col. 11, ll. 1-3, 9-26, 34-60; Col. 12, ll. 13-65;</p>	<p>“an operation performed on a packet specified by the dynamic security policy, such as forward or drop”</p> <p><u>Intrinsic Evidence:</u></p> <p>'213 Patent at Figs. 10-12; '213 Patent at cols. 1:38-63, 2:36-3:14, 4:48-5:40, 5:57-8:33, 10:4-11:33, 12:46-13:35, 16:37-17:22, 20:21-22:37, 23:19-47</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Col. 13, ll. 1-35, 57-67; Col. 14, ll. 1-7; Col. 16, ll. 25-67; Col. 17, ll. 1-21; Col. 20, ll. 21-50; Col. 21, ll. 1-39, 44-67; Col. 22, ll. 1-67; Col. 23, ll. 19-47;</p> <p>'213 Patent File History including: 2/26/2016 Non-final Office action, 8/23/2016 Response to Non-Final Office Action, 11/16/2016 Notice of Allowance.</p> <p><u>Extrinsic Evidence:</u> Testimony from Dr. Nenad Medvidovic regarding the proper construction of the aforementioned term from the perspective of one of skill in the art based on the intrinsic record and extrinsic evidence.</p>	

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Any intrinsic and extrinsic evidence relied upon by Defendants Defendants' Invalidity Contentions.	
3.	dynamic security policy/policies	'205 Patent, Claims 17, 33	<p>“a non-static set of one or more rules, messages, instructions, files, or data structures associated with one or more packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'205 Patent Specification Abstract; Claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95; Col. 2, ll. 1-26; Col. 6, ll. 56-61; Col. 7, ll. 56-67; Col. 8, ll. 1-28, 63-67; Col. 9, ll. 1-19; Col. 18, ll. 42-50; Col. 20, ll. 28, 31, 35, 43-53; Col. 23, ll. 3-13; Col. 25, ll. 33-42;</p>	<p>“any rule, message, instruction, file, data structure, or the like that specifies criteria corresponding to one or more packets and identifies a packet transformation function to be performed on packets corresponding to the specified criteria”</p> <p><u>Intrinsic Evidence:</u></p> <p>'205 patent, claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95.</p> <p>'205 patent at 4:43-47, 6:58-61, 7:27-29, 7:47-49, 16:25-31.</p> <p>'205 patent, Fig. 3.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Col. 33, ll. 59-66; Col. 34, ll. 5-12; Col. 35, ll. 9-12; Col. 36, ll. 4-9, 17-22.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶¶ 16.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶ 21-22.</p>	
4.	dynamic security policy	'213 Patent, Claim 1, 3	<p>“a non-static set of one or more rules, messages, instructions, files, or data structures associated with one or more packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'213 Patent Title; Abstract; Figs. 1-13; Claims 1-15; Col. 1, ll. 36-67; Col. 2, ll. 1-49, 60-67;</p>	<p>“any rule, message, instruction, file, data structure, or the like that specifies criteria corresponding to one or more packets and identifies a packet transformation function to be performed on packets corresponding to the specified criteria”</p> <p><u>Intrinsic Evidence:</u></p> <p>'213 Patent at Figs. 10-11; cols. 1:38-2:13, 2:27-3:1, 4:48-6:31, 7:7-11:60, 12:13-45, 14:7-23, 14:48-15:11, 15:38-57, 16:15-17:42, 18:23-60, 20:51-21:43, 22:7-37, 23:19-24:33</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Col. 3, ll. 1-37; Col. 4, ll. 48-67; Col. 5, ll. 1-40, 57-67; Col. 6, ll. 11-22, 50-57; Col. 7, ll. 7-60; Col. 8, ll. 4-67; Col. 9, ll. 1-67; Col. 10, ll. 1-13, 20-47; Col. 11, ll. 4-19, 34-60; Col. 12, ll. 13-46; Col. 13, ll. 36-67; Col. 14, ll. 1-67; Col. 15, ll. 1-42; Col. 16, ll. 34-44, 62-67; Col. 17, ll. 22-42; Col. 18, ll. 3-67; Col. 19, ll. 25-67; Col. 20, ll. 14-38, 45-67; Col. 21, ll. 1-43; Col. 22, ll. 7-37; Col. 23, ll. 1-67; Col. 24, ll. 1-34.</p> <p>'213 Patent File History including: 2/26/2016 Non-final Office action, 8/23/2016 Response to</p>	

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Non-Final Office Action, 11/16/2016 Notice of Allowance.</p> <p><u>Extrinsic Evidence:</u></p> <p>Testimony from Dr. Nenad Medvidovic regarding the proper construction of the aforementioned term from the perspective of one of skill in the art based on the intrinsic record and extrinsic evidence.</p> <p>Any intrinsic and extrinsic evidence relied upon by Defendants Defendants' Invalidity Contentions.</p>	
5.	rule/rules	'205 Patent, Claims 17, 33	<p>"condition or set of conditions that when satisfied cause a specific action to occur"</p> <p><u>Intrinsic Evidence:</u></p> <p>'205 Patent</p>	<p>"(i) packet-identifying criteria and (ii) a function to be performed on the identified packets"</p> <p><u>Intrinsic Evidence:</u></p> <p>'205 patent, claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Specification Abstract; Claims 1, 4, 7, 17, 20, 23, 33, 36, 39, 91, 93, 95; Col. 20, ll. 23-27; Col. 21, ll. 8-14, 38-42; Col. 22, ll. 48-53; Col. 25, ll. 10-15; Col. 26, ll. 4-7, 31-37.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 17.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶ 24.</p> <p>Dictionary of Computer and Internet Terms (2016)</p>	<p>'205 patent at 1:56-61, 1:63-67, 4:44-45, 6:56-66, 7:61-62, 7:64-66, 8:13-17.</p> <p>'205 patent, Fig. 3.</p> <p><u>Extrinsic Evidence:</u></p> <p>Dictionary of Computer and Internet Terms (2016).</p>
6.	rule/rules	'077 Patent, Claims 7, 13	<p>“condition or set of conditions that when satisfied cause a specific action to occur”</p>	<p>“(i) packet-identifying criteria and (ii) a function to be performed on the identified packets”</p> <p><u>Intrinsic Evidence:</u></p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p><u>Intrinsic Evidence:</u></p> <p>'077 Patent Specification Abstract; Claims 1, 3-5, 7, 9-11, 13, 15-17, 19; Col. 20, ll. 62-66; Col. 21, ll. 22-26, 62-66; Col. 22, ll. 22-28, 36-42, 65-67; Col. 23, ll. 1-2, 23-26, 42-48; Col. 24, ll. 17-28.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 18.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶ 26.</p> <p>Dictionary of Computer and Internet Terms (2016)</p>	<p>'077 patent, claims 1, 3-5, 7, 9-11, 13, 15-17, 19.</p> <p>'077 patent at 2:38-46, 3:4-14, 4:58-63, 6:11-31, 7:6-8:11.</p> <p>'077 patent, Fig. 3.</p> <p><u>Extrinsic Evidence:</u></p> <p>Dictionary of Computer and Internet Terms (2016).</p>
7.	switching matrix of local area network (LAN)	'077 Patent, Claims	"a matrix contained within a local area	"a structure configured to switch packets received from one or more devices on a local area network

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
	switch	7, 13	<p>network switch that may be configured to direct traffic from one device to another device in the network”</p> <p><u>Intrinsic Evidence:</u></p> <p>’077 Patent Specification Abstract; Claims 1, 3-5, 7, 9-11, 13, 15-17.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 19.</p> <p>Rebuttal Declaration of</p>	<p>to one or more devices on the local area network³”</p> <p><u>Intrinsic Evidence:</u></p> <p>’077 patent, claims 1, 3-5, 7, 9-11, 13, 15-17.</p> <p>’077 patent at 3:15-24, 10:13-11:8, 18:63-19:38.</p> <p>’077 patent, Fig. 9.</p> <p>1/8/2016 Detailed PTO Action at 16.</p> <p>9/15/16 PTO Amendment at 2.</p>

³ Centripetal’s Statement. Centripetal objects to Defendants’ construction because Defendants modified this term in their May 3, 2018 Responsive Claim Construction Brief from “a structure configured to switch packets received from one or more computers on a local area network to one or more computers on the local area network” and Centripetal has not had a chance to address Defendants’ new position. Defendants’ Statement. Centripetal’s objection should be overruled. Defendants modified this term to eliminate one of the Centripetal’s objections, which Centripetal raised for the first time in its April 20, 2018 Opening Claim Construction Brief (i.e., the use of “computer” instead of “device”). The purpose of the meet and confer process is to try to come to agreement by eliminating each side’s objections to the other side’s constructions—just as Defendants have done here. And Centripetal had from May 3 to May 11 to address Defendants’ modified construction, had Centripetal wanted to do so through the meet and confer process.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Dr. Nenad Medvidovic ¶ 28.	
8.	provision/provisioning each device of a plurality of devices, with one or more rules generated based on a boundary of a network protected by the plurality of devices with one or more networks other than the network protected by the plurality of devices at which the device is configured to be located	'077 Patent, Claims 7, 13	<p>“change a device from one state to another based on one or more rules derived from the boundary of a different network”</p> <p><u>Intrinsic Evidence:</u></p> <p>'077 Patent Specification Abstract; Claims 1, 3-5, 7, 9-11, 13, 15-17, 19; Col. 15, ll. 33-40, 51-67; Col. 16, ll. 1-9; Col. 20, ll. 53-58; Col. 21, ll. 53-58; Col. 22, ll. 56-61; Col. 24, ll. 8-13.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 20.</p>	<p>no construction needed/plain meaning</p> <p><u>Intrinsic Evidence:</u></p> <p>'077 patent, claims 1, 3-5, 7, 9-11, 13, 15-17, 19.</p> <p>'077 patent at 7:7-46.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 30-31.	
9.	network device	'370 Patent, Claim 61 ⁴	<p>“a computing device in a network that is capable of transmitting and receiving packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 Patent Specification Abstract; Figure 1; Claims 22-27, 33, 40, 43-48, 54, 61, 187, 188, 191, 194-195, 198, 201, 202, 205; Col. 2, ll. 44-52, 63-65; Col. 3, ll. 42-47; Col. 5, ll. 4-51; Col. 13, ll. 36-67; Col. 14, ll. 1-9.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 23.</p>	<p>“device that interfaces hosts with a network”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 patent, claims 22-27, 33, 40, 43-48, 54, 61, 187, 188, 191, 194-195, 198, 201, 202, 205.</p> <p>'370 patent at 1:10-14, 1:27-40, 2:23-35, 2:44-52, 8:23-40, 12:28-53.</p> <p>'370 patent, Fig. 1.</p>

⁴ The term “network device” is in the independent claim 43 which is the base claim of the dependent claim 61.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 34-37.	
10.	host	'370 Patent, Claim 61 ⁵	<p>“a computer device within a network that provides services other than simply acting as a store and forward processor or communications switch”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61, 160, 162, 164, 166, 169, 171, 173, 175, 178, 180, 182, 184, 187, 188, 191, 194, 195, 198, 201, 202, 205; Col. 3, ll. 37-39; Col. 4, ll. 36-38, 52-63; Col. 5, ll. 23-30, 33-39; Col. 6, ll. 41-53; Col. 7, ll. 13-23;</p>	<p>“computing or network devices (e.g. servers, desktop computers, laptop computers, tablet computers, mobile devices, smartphones, routers, gateways, switches, access points, or the like), or a communication interface thereof”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 patent at claims 22-27, 33, 40, 43-48, 54, 61, 160, 162, 164, 166, 169, 171, 173, 175, 178, 180, 182, 184, 187, 188, 191, 194, 195, 198, 201, 202, 205.</p> <p>370 patent at 2:39-43.</p> <p>'370 patent, Fig. 1.</p>

⁵ The term “host” is in both the independent claim 43 and the dependent claim 61.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Col. 9, ll. 20-35, 55-63; Col. 10, ll. 26-35; Col. 12, ll. 41-67; Col. 13, ll. 1-25, 36-47.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶¶ 24-25.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 39-40.</p> <p>Oxford Dictionary of Computer Science, Seventh Edition, 2016.</p>	
11.	rule/rules	'370 Patent, Claim 61 ⁶	<p>“condition or set of conditions that when satisfied cause a specific action to occur”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 Patent Specification Abstract;</p>	<p>“(i) packet-identifying criteria and (ii) a function to be performed on the identified packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 patent, claim 22.</p> <p>'370 patent at 3:4-11, 3:24-27.</p>

⁶ The term “rule/rules” is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Claims 22-27, 33, 40, 43-48, 54, 61, 187, 188, 191, 194, 195, 198, 201, 202, 205; Col. 9, ll. 48-52.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶¶ 26-27.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 41-42.</p> <p>Dictionary of Computer and Internet Terms (2016).</p>	<p><u>Extrinsic Evidence:</u></p> <p>Dictionary of Computer and Internet Terms (2016).</p>
12.	log entries	'370 Patent, Claim 61 ⁷	<p>plain and ordinary meaning</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61, 160, 162,</p>	<p>“notations of unique identifying information for each packet”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 patent at 3:11-19, 3:62-4:39, 4:40-51, 6:14-40, 6:54-67, 7:63-8:11, 8:41-9:19, 10:1-14, 11:8-21, 13:36-59.</p>

⁷ The term “log entries” is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>164, 166, 169, 171, 173, 175, 178, 180, 182, 184, 187, 188, 191, 194, 195, 198, 201, 202, 205; Col. 1, ll. 30-37; Col. 3, ll. 18-19, 43-44, 52-53; Col. 4, ll. 4-39; Col. 7, ll. 23-25; Col. 13, ll. 43-44, 52-53.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 28.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 44-45.</p>	'370 patent, Figs. 3, 4.
13.	correlate/correlating	'370 Patent, Claim 61 ⁸	<p>“programming instructions that cause a packet correlator to determine whether a portion of data in one log entry corresponds to a portion of data in</p>	<p>“determining by hardware or software (e.g. a packet correlator) whether log entries in different files correspond to the same packet”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 patent, claims 22-27, 33, 40, 43-48, 54, 61,</p>

⁸ The term “correlate/correlating” is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>another log entry”</p> <p><u>Intrinsic Evidence:</u></p> <p>'370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61, 160, 162, 164, 166, 169, 171, 173, 175, 178, 180, 182, 184, 187, 188, 191, 194, 195, 198, 201, 202, 205; Col. 8, ll. 23-67; Col. 9, ll. 1-19, 45-54; Col. 11, ll. 33-67; Col. 12, ll. 1-27; Col. 13, ll. 56-59; Col. 19, ll. 45-54; Col. 20, ll. 26-34; Col. 21, ll. 41-46; Col. 24, ll. 9-19, 59-67; Col. 26, ll. 13-21; Col. 50, ll. 14-27, 44-48, 57-65; Col. 51, ll. 59-67; Col. 52, ll. 1-5, 24-28, 42-49; Col. 53, ll. 44-57; Col. 54, ll. 7-11, 27-34; Col. 55, ll. 27-36, 54-</p>	<p>160, 162, 164, 166, 169, 171, 173, 175, 178, 180, 182, 184, 187, 188, 191, 194, 195, 198, 201, 202, 205.</p> <p>'370 patent at 1:1-14, 8:24-9:19, 9:45-54, 11:33-13:6, 13:36-59, 14:2-8.</p> <p>'370 patent, Figs. 2A, 2B, 2C, 2D, 4.</p> <p><u>Extrinsic Evidence:</u></p> <p>Dkt. No 31 (Declaration Of Matthew Blaze, Ph.D. In Support Of Centripetal Networks, Inc.'s Opposition To Defendants' Motion To Dismiss For Unpatentability Under 35 U.S.C. § 101.)</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			61; Col. 56, ll. 11-20, 50-59; Col. 57, ll. 12-20, 40-48; Col. 58, ll. 13-23, 42-48; Col. 59, ll. 4-12. <u>Extrinsic Evidence:</u> Opening Declaration of Dr. Nenad Medvidovic ¶ 29. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 46-47.	
14.	device in a communication link	'370 Patent, Claim 61 ⁹	"device in a computer network" <u>Intrinsic Evidence:</u> '370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61.	"device in a communication path" <u>Intrinsic Evidence:</u> '370 patent, claims 22-27, 33, 40, 43-48, 54, 61. '370 patent at 2:54-57. '370 patent, Fig. 1

⁹ The term "device in a communication link" is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<u>Extrinsic Evidence:</u> Opening Declaration of Dr. Nenad Medvidovic ¶ 31. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 49-50.	<u>Extrinsic Evidence:</u> Dictionary of Computer and Internet Terms, 2013, Eleventh Edition. Centripetal's Preliminary Constructions.
15.	provision a device in a communication link interfacing a network device and a first/second network	'370 Patent, Claim 61 ¹⁰	“changing a device from one state to another where the device is communicatively coupled to a network device and a first/second network” <u>Intrinsic Evidence:</u> '370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61; Col. 3, ll. 11-19; Col. 13, ll. 28-36, 54-	no construction needed/plain meaning <u>Intrinsic Evidence:</u> '370 patent, claims 22-27, 33, 40, 43-48, 54, 61.

¹⁰ The term “provision a device in a communication link interfacing a network device and a first/second network” is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			60; Col. 19, ll. 8-21; Col. 23, ll. 40-53. <u>Extrinsic Evidence:</u> Opening Declaration of Dr. Nenad Medvidovic ¶ 32. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 52-53.	
16.	identify the plurality of packets received/transmitted by the network device	'370 Patent, Claim 61 ¹¹	“determine the network-layer or transport-layer data contained within the plurality of packets received/transmitted by the network device” <u>Intrinsic Evidence:</u> '370 Patent Specification Abstract; Claims 22-27, 33, 40, 43-48, 54, 61; Col. 3, ll. 31-32, 48-54;	no construction needed/plain meaning <u>Intrinsic Evidence:</u> '370 patent, claims 22-27, 33, 40, 43-48, 54, 61. '370 patent at 5:58-64.

¹¹ The term “identify the plurality of packets received/transmitted by the network device” is in the base independent claim 43.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Col. 5, ll. 8-18, 58-67; Col. 6, ll. 1-5, 43-50; Col. 7, ll. 35-58; Col. 10, ll. 49-67; Col. 11, ll. 1-4; Col. 12, ll. 63-66. <u>Extrinsic Evidence:</u> Opening Declaration of Dr. Nenad Medvidovic ¶ 33. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 55-56.	
17.	configured to cause the computing system to log packets	'370 Patent, Claim 61 ¹²	“programming instructions that cause the system to generate a log file containing packet data” <u>Intrinsic Evidence:</u> '370 Patent Specification Abstract; Claims 22-27, 33, 40,	no construction needed/plain meaning <u>Intrinsic Evidence:</u> '370 patent, claims 22-27, 33, 40, 43-48, 54, 61.

¹² The term “configured to cause the computing system to log packets” is in the base independent claim 43. The term “configured to cause the system to log packets” is no longer in the updated set of asserted claims.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>43-48, 54, 61;</p> <p>Col. 3, ll. 13-20, 54-67; Col. 4, ll. 1-39; Col. 6, ll. 5-27, 50-51; Col. 7, ll. 59-60; Col. 9, ll. 1-19, 49-50, 64-67; Col. 10, ll. 1-14; Col. 11, ll. 4-7; Col. 12, ll. 4-16; Col. 13, ll. 7-9, 12-19, 42-50; Col. 19, ll. 28-30, 38-40, 45-51; Col. 23, ll. 60-61; Col. 24, ll. 3-5, 10-16.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶¶ 34-35.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 58-59.</p>	
18.	packet-filtering device	'722 Patent, Claims 1, 25	"a device programmed to filter packets based on data associated with	no construction needed/plain meaning

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>a packet”</p> <p><u>Intrinsic Evidence:</u></p> <p>’722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 1, ll. 52-67; Col. 2, ll. 1-10; Col. 3, ll. 44-67; Col. 4, ll. 1-4, 59-67; Col. 5, ll. 1-6, 19-24, 37-67; Col. 6, ll. 1-11, 25-26, 32-37; Col. 7, ll. 14-21, 22-24; Col. 8, ll. 8-14; Col. 9, ll. 14-22, 39-52; Col. 10, ll. 23-28, 35-41; Col. 11, ll. 3-14; Col. 15, ll. 33-42, 53-67; Col. 16, ll. 1-34; Col. 17, ll. 18-20.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic</p>	<p><u>Intrinsic Evidence:</u></p> <p>’722 patent, claims 1-5, 24-25.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			¶ 37. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 61-62.	
19.	packet-filtering rules	'722 Patent, Claims 1, 25	<p>“condition or set of conditions that when satisfied cause a computing device to filter packets based on data associated with a packet”</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 1, ll. 45-55; Col. 4, ll. 10-18, 59-64; Col. 5, ll. 7-13, 40-44, 58-59; Col. 6, ll. 12-24; Col. 7, ll. 1-11; Col. 13, ll. 21-28, 41-42.</p> <p><u>Extrinsic Evidence:</u></p>	<p>“(i) packet-identifying criteria and (ii) an operator to be performed on the identified packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 patent, claim 1-5, 24-25.</p> <p>'722 patent at Abstract, 1:53-55, 2:31-33, 5:7-36, 6:12-24, 6:55-7:11, 9:3-13, 10:42-52, 11:14-24, 11:27-37, 11:46-56, 12:4-14, 12:34-44, 13:33-46, 14:32-40, 15:4-11, 17:24-34.</p> <p>'722 patent, Figs. 4A, 4B, 4C, 7.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Opening Declaration of Dr. Nenad Medvidovic ¶¶ 38-39. Rebuttal Declaration of Dr. Nenad Medvidovic ¶ 64.	
20.	packet-filtering rules	'856 Patent, Claims 18 ¹³ , 24, 25	<p>“condition or set of conditions that when satisfied cause a computing device to filter packets based on data associated with a packet”</p> <p><u>Intrinsic Evidence:</u></p> <p>'856 Patent Title; Abstract; Figs. 1-7; Claims 1-25; Col. 1, ll. 24-45; Col. 2, ll. 35-67; Col. 3, ll. 1-14, 29-67; Col. 4, ll. 1-21, 28-67; Col. 5, ll. 1-30, 55-67; Col. 6, ll. 1-6, 17-67;</p>	<p>“(i) packet-identifying criteria and (ii) an operator to be performed on the identified packets”</p> <p><u>Intrinsic Evidence:</u></p> <p>'856 Patent at 1:35-39; 1:40-45; 3:8-11; 3:33-54; 3:66-4:9; 4:32-5:14; 6:36-59; 7:17-32, 7:62-8:5; 11:20-26;</p> <p>'856 Patent, Claims 24, 25; '856 Patent, Fig. 7.</p>

¹³ The term “packet-filtering rules” is in claim 1 of the '856 Patent which is the base claim of the asserted claim 18.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Col. 7, ll. 1-32, 41-67; Col. 8, ll. 6-53; Col. 9, ll. 2-65; Col. 10, ll. 2-67; Col. 11, ll. 8-65; Col. 12, ll. 1-67; Col. 13, ll. 7-67; Col. 14, ll. 1-67; Col. 15, ll. 1-67; Col. 16, ll. 1-26, 29-64; Col. 17, ll. 1-12, 15-67; Col. 18, ll. 1-19, 28-67; Col. 19, ll. 7-39, 51-67; Col. 20, ll. 1-27, 30-67; Col. 21, ll. 1-67; Col. 22, ll. 1-18, 20-51, 56-67; Col. 23, ll. 1-32, 39-67; Col. 24, ll. 1-8.</p> <p>'856 Patent File History including: 4/12/2017 Non-final Office Action, 10/11/2017 Response to Non-Final Office Action, 12/20/2017 Notice of Allowance.</p>	

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>	
			<p><u>Extrinsic Evidence:</u> Testimony from Dr. Nenad Medvidovic regarding the proper construction of the aforementioned term from the perspective of one of skill in the art based on the intrinsic record and extrinsic evidence.</p> <p>Any intrinsic and extrinsic evidence relied upon by Defendants.</p> <p>Defendants' Invalidity Contentions.</p>		
21.	interface	'722 Patent, Claims 1, 25	<p>plain and ordinary meaning</p> <p><u>Intrinsic Evidence:</u> '722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 3, ll. 3-4; Col. 4, ll. 8; Col. 6, ll. 39-40; Col. 17, ll. 40-47.</p>	<p>“a display visible to the user that allows a user to provide input”</p> <p><u>Intrinsic Evidence:</u> '722 patent, claims 1-5, 24-25. '722 patent at 7:46-8:7, 9:33-53, 17:40-48. '722 patent, Figs. 6A, 6B, 6C, 6D, 6E, 6F, 6G.</p>	

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 40.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶ 65.</p> <p>Oxford Dictionary of Computer Science (2016).</p>	
22.	operator	'722 Patent, Claims 1, 25	“an adjustable instruction that causes the packet filtering device to either prevent or allow a packet to continue to a destination”	<p>“function to either prevent a packet corresponding to criteria from continuing or allow it to continue to its destination¹⁴”</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 patent, claims 1-5, 24-25.</p>

¹⁴ Centripetal's Statement. Centripetal objects to Defendants' construction because Defendants modified this term in their May 3, 2018 Responsive Claim Construction Brief from “function to either block a packet corresponding to criteria or allow it to continue to its destination” and Centripetal has not had a chance to address Defendants' new position. Defendants' Statement. Centripetal's objection should be overruled. Defendants modified this term to eliminate one of Centripetal's objections to Defendants' construction, which Centripetal raised for the first time in its April 20, 2018 Opening Claim Construction Brief (i.e., the use of “block” instead of “prevent”). The purpose of the meet and confer process is to try to come to agreement by eliminating each side's objections to the other side's constructions—just as Defendants have done here. And Centripetal had from May 3 to May 11 to address Defendants' modified construction, had Centripetal wanted to do so through the meet and confer process.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p><u>Intrinsic Evidence:</u></p> <p>'722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 2, ll. 5-10; Col. 9, ll. 33-39, 57-67; Col. 10, ll. 1-14; Col. 11, ll. 1-10, 55-57, 60-67; Col. 12, ll. 1-3, 15-28; Col. 13, ll. 62-67; Col. 14, ll. 1-21, 53-67;</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶¶ 41-42.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 66-67.</p>	<p>'722 patent at 1:55-58, 5:19-24, 6:18-21, 6:64-67, 9:9-12, 9:33-53, 10:35-41, 10:48-51, 11:20-24, 11:30-36, 12:10-14, 12:40-43, 12:53-56, 14:12-21, 14:36-40, 15:7-11, 16:1-7, 17:30-34, 17:50-55.</p> <p>'722 patent, Figs. 4A, 4B, 4C, 6C.</p>
23.	responsive to a determination by the packet-filtering device that the first packet satisfies one or more criteria, specified by a packet-filtering rule of	'722 Patent, Claims 1, 25	"if the packet-filtering device determines the first packet meets one or more conditions associated with one or more network threat indicators from a packet	<p>no construction needed/plain meaning</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 patent, claims 1-5, 24-25.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
	the plurality of packet-filtering rules, that correspond to one or more network-threat indicators of the plurality of network-threat indicators		<p>filtering rule”</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 1, ll. 46-67; Col. 2, ll. 1-10; Col. 6, ll. 55-67; Col. 7, ll. 1-12; Col. 9, ll. 3-67; Col. 10, ll. 1-52; Col. 12, ll. 33-67; Col. 13, ll. 1-47; Col. 15, ll. 63-67; Col. 16, ll. 1-34; Col. 17, ll. 15-18;</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 43.</p> <p>Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 66.</p>	
24.	communicating, by the packet-filtering device,	'722 Patent, Claims 1, 25	“causing a packet-filtering device to	no construction needed/plain meaning

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
	information from the packet-filtering rule that identifies the one or more network-threat indicators, and data indicative that the first packet was allowed to continue toward the destination of the first packet		<p>generate and communicate a record that identifies (1) a network threat indicator based on a rule and (2) data that indicates that the first packet was allowed to continue toward the destination”</p> <p><u>Intrinsic Evidence:</u></p> <p>’722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 6, ll. 13-54, 59-67; Col. 7, ll. 48-67; Col. 8, ll. 1-7, 27-39; Col. 11, ll. 16-37, 45-59; Col. 12, ll. 34-57; Col. 13, ll. 3-14; Col. 16, ll. 8-33.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic ¶ 44.</p>	<p><u>Intrinsic Evidence:</u></p> <p>’722 patent, claims 1-5, 24-25.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 69-70.	
25.	modifying, by the packet-filtering device, at least one operator specified by the packet-filtering rule to reconfigure the packet-filtering device to prevent packets corresponding to the one or more criteria from continuing toward their respective destinations	'722 Patent, Claims 1, 25	<p>“modifying the state of the packet-filtering device to cause an adjustable instruction to prevent a packet from continuing toward its destination”</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 Patent Specification Abstract; Claims 1-5, 24-25; Col. 1, ll. 55-57; Col. 2, ll. 7-10; Col. 5, ll. 19-22; Col. 9, ll. 14-26, 46-49; Col. 10, ll. 47-52; Col. 13, ll. 33-47; Col. 14, ll. 13-21; Col. 17, ll. 50-55.</p> <p><u>Extrinsic Evidence:</u></p> <p>Opening Declaration of Dr. Nenad Medvidovic</p>	<p>no construction needed/plain meaning</p> <p><u>Intrinsic Evidence:</u></p> <p>'722 patent, claims 1-5, 24-25.</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			¶ 45. Rebuttal Declaration of Dr. Nenad Medvidovic ¶¶ 71-72.	
26.	user	'722 Patent, Claims 1, 25	plain and ordinary meaning <u>Intrinsic Evidence:</u> '722 Patent Specification Abstract; Claims 1, 2-5, 24-25; Col. 7, ll. 52-62; Col. 9, ll. 33-44; Col. 10, ll. 15-18, 28-34.	"person (e.g., administrator)" <u>Intrinsic Evidence:</u> '722 patent, claims 1, 2-5, 24-25. '722 patent at 7:46-8:7, 9:33-53. '722 patent, Figs. 6A, 6B, 6C, 6D, 6E, 6F, 6G. <u>Extrinsic Evidence:</u> Dkt. No. 30 (Centripetal Networks, Inc.'s Opposition To Defendants' Motion To Dismiss For Unpatentability Under 35 U.S.C. § 101.) Dkt. No. 60 (Transcript of hearing on Defendants' Motion To Dismiss For Unpatentability Under 35 U.S.C. § 101.)
27.	proxy system	'856 Patent, Claims 18, 24, 25 ¹⁵	plain and ordinary meaning <u>Intrinsic Evidence</u>	system that establishes connections to devices in trusted and untrusted environments and relays packets between a device in the trusted environment and a device in the untrusted environment

¹⁵ The term "proxy system" is in claims 1, 24, and 25. Claim 1 is the base independent claim of the asserted claim 18.

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>'856 Patent Title; Abstract; Figs. 1-7; Claims 1-25; Col. 2, ll. 35-60; Col. 6, ll. 33-67; Col. 7, ll. 1-67; Col. 8, ll. 1-67; Col. 9, ll. 1-12, 47-65; Col. 10, ll. 1-67; Col. 11, ll. 35-67; Col. 12, ll. 1-67; Col. 13, ll. 1-21, 22-37, 38-54; Col. 14, ll. 19-67; Col. 15, ll. 1-49; Col. 16, ll. 29-67; Col. 17, ll. 1-67; Col. 18, ll. 1-18, 19-67; Col. 19, ll. 1-67; Col. 20, ll. 1-21; Col. 22, ll. 56-67; Col. 23, ll. 1-39.</p> <p>'856 Patent File History including: 4/12/2017 Non-final Office Action, 10/11/2017 Response to</p>	<p><u>Intrinsic Evidence:</u></p> <p>'856 Patent at 1:7-20, 2:20-60; 6:17-7:24; 7:24-36; 7:56-60; 8:65-9:65; 11:36-54; 14:51-55 '856 Patent, Fig. 1; Figs. 3A-3C; Figs. 4A-4C</p> <p><u>Extrinsic Evidence:</u></p> <p>Newton's Telecom Dictionary (20th Ed. 2004), pgs. 665-666 ("Proxy Server A proxy is an application running on a gateway that relays packets between a trusted client and an untrusted host. A proxy server is software that runs on a PC and is a basically a corporate telephone system for the Internet...A proxy server is typically also a firewall – that means it keeps unwanted intrusion from the Internet getting into your corporate network....Proxy servers provide extra security by replacing calls to insecure systems' subroutines....Acting as behind-the-scenes directors, proxy servers can also help distribute processing load and provide an added layer of security....In short, a proxy server lets your employees access the Internet right from their desk-top PCs over a shared, managed, and secure connection to the Internet...")</p>

	<u>Terms</u>	<u>Patent Claims</u>	<u>Plaintiff's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
			<p>Non-Final Office Action, 12/20/2017 Notice of Allowance.</p> <p><u>Extrinsic Evidence:</u></p> <p>Testimony from Dr. Nenad Medvidovic regarding the proper construction of the aforementioned term from the perspective of one of skill in the art based on the intrinsic record and extrinsic evidence.</p> <p>Any intrinsic and extrinsic evidence relied upon by Defendants.</p> <p>Defendants' Invalidity Contentions.</p>	