EXHIBIT A

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Attorneys for Defendant and Counterclaim Plaintiff MAGIC CONTROL TECHNOLOGY CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DISPLAYLINK CORPORATION, a Washington corporation,

Plaintiff,

v.

MAGIC CONTROL TECHNOLOGY CORPORATION, a Taiwanese corporation;

Defendant.

AND RELATED COUNTERCLAIMS

CASE NO.: 5:07-CV-01998-RMW

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT PURSUANT TO PATENT LOCAL RULE 4-3

Pursuant to Patent Local Rule 4-3, Plaintiff and Counterclaim Defendant DisplayLink Corporation ("DisplayLink") and Defendant and Counterclaim Plaintiff Magic Control Technology Corporation ("MCT") submit this Joint Claim Construction and Prehearing Statement regarding U.S. Patent No. 7,203,788 ("the '788 patent").

(a) The construction of those claim terms, phrases, or clauses on which the parties agree is as follows:

Many of the claim terms, phrases, and clauses in the asserted claims are not disputed by the parties. Further, the parties have met and conferred in an attempt to narrow the list of disputed terms, and DisplayLink has agreed to MCT's proposed constructions for the following terms:

TERM, PHRASE, OR CLAUSE	CLAIM(S)	AGREED CONSTRUCTION
the USB controller issuing a bus control command	1 & 19	The USB controller generating electrical signals representing a bus control command.
bus control command	1 & 19	Instruction for a task issued on electrical line(s) that specifies type, timing, location, and other details of the task to be performed.
the bridge receiving the bus control command	1 & 19	The bridge receiving electrical signals representing the bus control command.
VGA signals	1 & 19	DisplayLink maintains its positions that the term "VGA signals" is indefinite under 35 U.S.C. § 112, ¶ 2, but, in the alternative, DisplayLink agrees to MCT's construction: Signals according to the VGA standard.

(b) Each party's proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction of the claim or to oppose any other party's proposed construction of the claim, including, but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses:

TERM, PHRASE, OR CLAUSE AND CLAIM IN WHICH IT APPEARS	DISPLAYLINK'S PROPOSED CONSTRUCTION AND EVIDENCE	MCT'S PROPOSED CONSTRUCTION AND EVIDENCE
USB controller (claims 1 & 19)	Component(s) that controls the receipt, storage, and routing of USB encoded data. ***Intrinsic***: Abstract; 1:37-62; 2:21-3:44; claim 9; Figures 2-3; March 16, 2005 Official Action; June 15,	Device that communicates with the computer according to the USB standard and communicates with the bridge in the signal form understood by the bridge ***Intrinsic:*** Abstract; Summary Of The

	2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability. ***Extrinsic***: USB Specifications [DL 016837-018366]	Invention: 1:45-60; Detailed Description Of The Preferred Embodiments: 2:21-60; 3:4-28; Claim 9; Figs. 1-3.
for receiving exclusively therethrough USB based display signals (claims 1 & 19)	Indefinite under 35 U.S.C. § 112, ¶ 2 or, in the alternative, For receiving only USB based display signals into the USB controller. ***Intrinsic***: 1:41-62; 3:66-4:20; 4:36-48; Figures 1-3, 5, and 6; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability. ***Extrinsic***: **receive** *vb* – **1** : to take in or accept (as something sent or paid) : come into possession of : GET **2** : CONTAIN, HOLD **3** : to permit to enter : GREET, WELCOME **4** to be at home to visitors **5** : to accept as true or authoritative **6** : to be the subject of : UNDERGO, EXPERIENCE <~ a shock> 7 : to change incoming radio waves into sounds or pictures *Merriam-Webster Dictionary Home & Office Edition* (1998), at 436. [DL 019358-019361]	For receiving all of the USB signals containing display information and forwarding them to the bridge in the signal form understood by the bridge ***Intrinsic:*** Abstract; Summary Of The Invention: 1:45-60; Detailed Description Of The Preferred Embodiments: 2:21-33; 4:7-20; Figs 1-3.
USB based display signals (claims 1 & 19)	USB encoded display signals. ***Intrinsic***: 1:31-62; 2:21-40; 3:52-65; 4:36-48; claim 9, Figure 4; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006	USB signals containing display information. ***Intrinsic***: Abstract; Summary Of The Invention: 1:31-40; 1:46-62; Detailed Description Of The Preferred Embodiments: 2:21-40; 2:46-53; 2:60-3:3; 3:21-44; 4:36-48; Claim 9; Figs. 1-6.

	Supplemental Amendment; May 11, 2006 Notice of Allowability.	
USB based display signals from the computer (claims 1 & 19)	Indefinite under 35 U.S.C. § 112, ¶ 2 or, in the alternative, USB encoded display signals representing the image rendered by the computer.- ***Intrinsic***: 1:31-62; 2:21-40; 3:52-65; 4:36-48; claim 9, Figure 4; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability.	USB signals containing display information from the computer. ***Intrinsic***: Abstract; Summary Of The Invention: 1:31-40; 1:46-62; Detailed Description Of The Preferred Embodiments: 2:21-40; 2:46-53; 2:60-3:3; 3:21-44; 4:36-48; Claim 9; Figs. 1-6.
VGA controller (claims 1 & 19)	Component(s) that controls the routing of VGA signals pursuant to the VGA standard. ***Intrinsic***: Abstract; 1:12-28; 1:41-62; 2:33-40; 4:21-35; claims 8 and 9; Figures 1-3; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability. ***Extrinsic***: *PS/2 Video Subsystem Technical Reference Manual* (May 19, 1992). [DL 018926-019350]	Device that communicates with a display device according to the VGA standard and communicates with the bridge in the signal form understood by the bridge. ***Intrinsic***: Abstract; Summary Of The Invention: 1:46-60; Detailed Description Of The Preferred Embodiments: 2:22-40; 4:21-35; Figs. 1-3.
display device (claims 1 & 19)	Electronic device for visually representing VGA signals. ***Intrinsic***: 1:12-28; 1:31-40; 1:46-62; 2:33-40; 3:21-44; 4:21-35; 4:36-48; claim 8, Figures 1, 5, and 6; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment;	Device that converts electrical signals to images. ***Intrinsic***: Abstract; Background Of The Invention: 1:5-28; Summary Of The Invention: 1:32-60; Detailed Description Of The Preferred Embodiments: 2:22-40; 2:67-3:3; 3:21-44; 4:7-48; Claim 9; Figs. 1, 5, and 6.

	May 11, 2006 Notice of Allowability. ***Extrinsic***: **display device (1)** In computer graphics, an output device on which display images can be represented. For example, cathode ray tube display device, ... **(2)** An output device that gives a visual representation of data. ... IEEE 100, *The Authoritative Dictionary of IEEE Standards Terms* (7th ed. 2000), at 324. [DL 019351-019354] **display device** *See* display. *Computer Dictionary* (2d ed. 1994), at 128. [DL 018921-018925] **display** Usually, the visual output device of a computer, which is commonly a CRT-based video display. ... *Computer Dictionary* (2d ed. 1994), at 127. [DL 018921-018925]	
bridge (claims 1 & 19)	Component(s) for communicating between two or more buses each using different interface standards. ***Intrinsic***: Abstract; 1:31-40; 1:46-62; 2:21-3:3; 3:21-44; 4:7-20; claim 9; Figures 1-3; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability. ***Extrinsic***: **Bridge** An interconnect between two or more buses that provides signal and logical protocol translation from one bus to another ... IEEE 100, *The Authoritative*	Device that converts electrical signals between different domains in the form understood by the receiving domains, through which each signal travels over a fixed path. ***Intrinsic***: Abstract; Summary Of The Invention: 1:46-60; Detailed Description Of The Preferred Embodiments: 2:21-3:51; 4:7-20; Claim 9; Figs.1-3, 5.

	Dictionary of IEEE Standards Terms (7th Ed. 2000), at 118. [DL 019351-019354]	
connecting the USB controller and the VGA controller one to the other for the passage of data therebetween (claims 1 & 19)	Connecting the USB controller to the VGA controller such that the VGA controller can receive video data only from the USB controller via the bridge. ***Intrinsic***: Abstract; 1:31-36; 1:41-62; 2:21-40; claim 9; Figure1-3; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability.	Connecting the USB controller and the VGA controller to exchange electrical signals. ***Intrinsic***: Abstract; Background Of The Invention: 1:5-10; Summary Of The Invention: 1:46-60; Detailed Description Of The Preferred Embodiments: 2:21-40; 4:7-20; Figs. 1-3.
the bridge ... issuing a first-in-first-out control signal to the USB controller (claims 1 & 19)	The bridge generating signals instructing the USB controller to read data in the order in which it was received by the USB controller. ***Intrinsic***: Abstract; 1:37-40; 1:46-62; 2:33-40; 2:54-3:3; 3:21-44; claim 9; Figures 2-3; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability.	The bridge … generating electrical signals representing a time sequence control signal to the USB controller. ***Intrinsic***: Abstract; Summary Of The Invention: 1:52-56; Detailed Description Of The Preferred Embodiments: 2:33-38; 2:54-60; 3:21-28; Claim 9; Figs. 2-3.
to receive the USB based display signals from the USB controller in a first-in-first-out manner (claims 1 & 19)	To receive USB based display signals from the USB controller in the order in which they were received by the USB controller. ***Intrinsic***: Abstract; 1:37-40; 1:46-62; 2:33-40; 2:54-3:3; 3:21-44; claim 9; Figures 2-3; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability.	To receive the USB signals containing display information from the USB controller in a time sequence manner. ***Intrinsic***: Abstract; Summary Of The Invention: 1:52-56; Detailed Description Of The Preferred Embodiments: 2:33-38; 2:54-60; 3:21-28; Claim 9; Figs. 2-3.
the bridge circuit	The bridge circuit converting	The bridge circuit translating the

converting the USB based display signals into corresponding VGA signals (claims 1 & 19)	the USB based display signals into [preceding terms defined above] PCI type or AGP type, or equivalent bus topology, encoded display signals for passage to the VGA controller. ***Intrinsic***: Abstract; 1:12-28; 1:41-62; 2:21-3:3; 3:21-44; claims 9 and 15; Figure 4; March 16, 2005 Official Action; June 15, 2005 Response; September 1, 2005 Official Action; January 16, 2006 response; March 2, 2006 Supplemental Amendment; May 11, 2006 Notice of Allowability.	USB signals containing display information into corresponding display signals according to the VGA standard. ***Intrinsic***: Abstract; Summary Of The Invention: 1:46-61; Detailed Description Of The Preferred Embodiments: 2:33-53; 2:67, 3:1-3; 3:35-44; Claims 9, 15; Figs. 2-3.
USB[1] (claims 1 & 19)	Universal Serial Bus, the technology described in the Universal Serial Bus Specification Revision 2.0 and its predecessor revisions. ***Intrinsic***: 1:6-10. ***Extrinsic***: USB Specifications. [DL 016837-018366]	USB has an ordinary and customary meaning to a person of ordinary skill in the art. USB generically refers to any serial bus specifications which support USB based display signals from the host computer and which are compatible with any USB port/plug. ***Intrinsic***: Background Of The Invention: 1:5-10; Summary Of The Invention: 1:31-45; Detailed Description Of The Preferred Embodiments: 3:52-65; 4:36-48; Claims 4,7. ***Extrinsic***: *Testimony of Paul Min.*

[1] DisplayLink objects to MCT's late provision of definitions for the terms USB and VGA. The terms USB and VGA were identified by MCT as terms for construction in its Patent Local Rule 4-1 statement served on October 29, 2007 but MCT did not provide its proposed construction for the terms until December 13, 2007. DisplayLink reserves the right to address this issue before the Court.

MCT notes, in response, that it had initially taken the position that the terms "VGA" and "USB" did not require construction; accordingly, it had not provided a definition for these terms. During the meet and confer process (which occurred on December 11-13) MCT compromised and agreed that it would join with DisplayLink in requesting the these terms be construed by the court. Having so compromised, MCT was then obligated to provide its proposed definition for these two terms and it did so. Significantly, DisplayLink has shown no prejudice from this supposedly "late" provision of definitions as it has not changed its definitions from those it originally proposed.

VGA (claims 1 & 19)	Video Graphics Array, the technology described in IBM Corporation, *Personal System/2 Hardware Interface Technical Reference* (1988 and as updated in 1991) and in *IBM Personal System/2 and Personal Computer BIOS Interface Technical Reference* (1991). ***Intrinsic***: 1:6-10; 1:12-28. ***Extrinsic***: *PS/2 Video Subsystem Technical Reference Manual* (May 19, 1992) [DL 018926-019350] *IBM Personal System/2 and Personal Computer BIOS Interface Technical Reference* (1991). [DL 019362-019917]	VGA has an ordinary and customary meaning to a person of ordinary skill in the art. VGA generically refers to all video display standards compatible with any 15-pin VGA port/plug. ***Intrinsic***: Background Of The Invention: 1:5-10; 1:12-28; Detailed Description Of The Preferred Embodiments: 2:46-53; 3:35-44; Claims 3,5,15; Figs. 1-3. ***Extrinsic***: *Testimony of Paul Min.*

(c) The anticipated length of time necessary for the Claim Construction Hearing is:

The parties agree that the Claim Construction Hearing can be completed in 3 hours.

Should the Court believe a technology tutorial useful in this action, the parties will each present such a tutorial. MCT believes it may need up to 30 minutes for a tutorial and has no objection to DisplayLink presenting a tutorial of any length it deems necessary. DisplayLink believes each parties' tutorial can be completed in 15 minutes.

(d) Whether any party proposes to call one or more witnesses, including experts, at the Claim Construction Hearing, the identity of such witness, and for each expert, a summary of each opinion to be offered in sufficient detail to permit a meaningful deposition of that experts;

DisplayLink reserves the right to rely upon expert testimony to demonstrate that the understanding of one of ordinary skill in the art at the relevant time period for the '788 patent would have been consistent with DisplayLink's proposed constructions if the Court believes such testimony would be helpful. Should the Court believe such testimony potentially helpful, one or more of Alan Jones, Adrian van den Heever, or Andrew Fisher may be called to provide such testimony. DisplayLink also reserves the right to call upon one or more of Alan Jones, Adrian van den Heever, or Andrew Fisher to clarify or rebut the expert testimony provided by MCT.

MCT proposes to call Dr. Paul Min as an expert to testify at the Claim Construction Hearing. Dr. Min shall testify as to the level of one of ordinary skill in the relevant art at the time of the invention and that the understanding of one of ordinary skill in the art at the time of the invention was consistent with the definitions proposed by MCT. As relevant, Dr. Min will also testify as to the background of the relevant technology. In particular, Dr. Min will testify that, at the time of the invention claimed in the '788 patent, the terms "VGA" and "USB" were commonly understood terms in the relevant art and that each of these terms is generic and is not tied to one particular version of the relevant standard, as DisplayLink argues. Dr. Min may also be called to rebut any testimony offered by DisplayLink's witnesses.

(e) A list of any other issues which might appropriately be taken up at a prehearing conference prior to the Claim Construction Hearing, and proposed dates, for any prehearing conference.

The parties do not presently intend to request a prehearing conference.

Dated: December 14, 2007

WILSON SONSINI GOODRICH & ROSATI

By: /s/ Stefani E. Shanberg
Stefani E. Shanberg

Attorneys for Plaintiff and Counter Defendant
DISPLAYLINK CORPORATION

Dated: December 14, 2007

WANG, HARTMAN, & GIBBS, P.C.

By: /s/ Richard F. Cauley
Richard F. Cauley

Attorneys for Defendant and Counterclaim Plaintiff
MAGIC CONTROL TECHNOLOGY
CORPORATION

I, Stefani E. Shanberg, am the ECF User whose identification and password are being used to file this Joint Claim Construction and Prehearing Statement Pursuant to Patent Local Rule 4-3. In compliance with General Order 45.X.B, I hereby attest that Richard F. Cauley has concurred in this filing.

Dated: December 14, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Stefani E. Shanberg
Stefani E. Shanberg