IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORACLE CORPORATION and ORACLE U.S.A. INC.,	)	
Plaintiffs,	)	
v.	)	C.A. No. 06-414 (SLR)
EPICREALM LICENSING, LP,	)	
Defendant.	)	

PARTIES' PROPOSED ELEMENT-BY-ELEMENT CLAIM CONSTRUCTION CHART

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Dated: June 30, 2008

Claim Term	Oracle's Proposed Construction	epicRealm's Proposed Construction
connection cache ('554 patent – claim 4)	a store of information identifying open connections to data sources for eliminating subsequent connect times to those data sources	no construction is necessary
data sources ('554 patent – claims 1-5, 8-9, 11) ('335 patent – claims [1], [15])[1]	computerized repositories from which data may be retrieved electronically	no construction is necessary
dispatcher ('554 patent – claim 1, 9, 11) ('335 patent – claims 2, 16)	a software program for determining which page server should be used to process a dynamic web page generation request	no construction is necessary
dispatching / dispatching said request to said page server ('554 patent – claims 1, 9, 11) ('335 patent – claims 2, 16)	analyzing a request to make an informed selection of which page server should process the request, and sending the request to that page server	examining a request to make an informed selection of which page server should process the request based on dynamic information maintained about page servers, the dynamic information indicating which page server can more efficiently process the request, and sending the request to the selected page server
HTTP-compliant device ('335 patent – claims 15, 16)	a device running software that implements the Hypertext Transfer Protocol	a device that is compliant with the communication protocol known as HyperText Transport Protocol (HTTP)
intercepting said request at said HTTP-compliant	receiving a request at the HTTP-compliant device and diverting	at least intercepting the handling of a request at a said HTTP-

[1] Claim numbers in brackets signify unasserted independent claims upon which asserted dependent claims rely.

Claim Term	Oracle's Proposed Construction	epicRealm's Proposed Construction
device ('335 patent – claim [1], [15])	the request before the HTTP-compliant device executable can process the request	compliant device
intercepting said request at said second computer system ('554 patent – claims 9, 10)	receiving a request at the second computer system and diverting the request before the second computer system executable can process the request	no construction is necessary
intercepting said request at said Web server ('554 patent – claims 1, 11) ('335 patent – claims [1])	receiving a request at the Web server machine and diverting the request before the Web server executable can process the request	intercepting the handling of a request at a Web server
interceptor ('554 patent – claim 10)	a software component that performs intercepting	no construction is necessary
logging into ('554 patent – claim 5)	presenting credentials that allow access to	no construction is necessary
machine readable medium ('554 patent – claim 11)	a hard disk, floppy disk, CD-ROM, magnetic tape, or other magnetic or optical data storage medium	no construction is necessary
page server ('554 patent – claims 1, 4, 7, 9, 10, 11) ('335 patent – claim [1], [15])	page generating software, running on a processor separate from that of the Web server, that generates dynamic Web pages Claims 9 of the '554 Patent and claims 15 and 29 of the '335 Patent are likewise construed with the substitution of "second computer system" and "HTTP-	page-generating software that generates a dynamic Web page

Claim Term	Oracle's Proposed Construction	epicRealm's Proposed Construction
	compliant device" respectively for "Web server."	
releasing ('554 patent – claims 1, 9, 11) ('335 patent – claims [1], [15])	(see below)	freeing
said page server receiving said request and releasing said Web server [or second computer system or HTTP-compliant device] to process other requests ('554 patent – claims 1, 9, 11) ('335 patent – claims [1], [15])	said page server receiving said request and said page server performing an act (separate from merely receiving the request) to free the Web server to process other requests. Claims 9 of the '554 Patent and claims 15 and 29 of the '335 Patent are likewise construed with the substitution of "second computer system" and "HTTP-compliant device" respectively for "Web server."	(see proposed construction for "releasing" above)
request ('554 patent – all) ('335 patent – all)	a message that asks for a Web page specified by a URL	a message that asks for a Web page
router ('554 patent – claims 9, 10)	a device that intercepts and dispatches dynamic Web page generation requests	no construction is necessary
Web page ('554 patent – claims 1, 3, 6, 7, 9, 11) ('335 patent – claim [1])	a file containing embedded commands in a Web formatting language such as HTML, capable of being displayed on a Web browser	Web content displayable through a Web browser

Claim Term	Oracle's Proposed Construction	epicRealm's Proposed Construction
Web server ('554 patent – claims 1, 11) ('335 patent – claim [1])	HTTP-compliant server software, or a machine running such software, that receives Web page requests and returns Web pages in response to the requests	software, or a machine having software, that receives Web page requests and returns Web pages in response to the requests
Means for generating [said request] ('554 patent – claim 9)	§ 112 ¶6 corresponding function: generating said request structure: a processor of a computer that is, or has, a Web client running a Web browser	"a processor of a computer that is, or has, a Web client running a Web browser" or equivalents thereof
Means for receiving [said request from said first computer] ('554 patent – claim 9)	§ 112 ¶6 corresponding function: receiving said request from said first computer structure: a processor of a computer that is, or has, a Web server running a Web server executable	"a processor of a computer that is, or has, a Web server running Web server executable" or equivalents thereof
Page server processing means ('554 patent – claim 9)	§ 112 ¶6 corresponding function: processing dynamic Web page generation requests corresponding structure: a processor of a computer that runs software for generating dynamic Web pages	"a processor of a computer that runs page server software (wherein page server software is page-generating software that generates a dynamic Web page)" or equivalents thereof

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