

EXHIBIT A

**Exhibit A - Proposed Claim Constructions for
U.S. Patent Nos. 7,666,096 (“’096”) and. 8,206,218 (“’218”)**

Agreed-Upon Constructions:

Claims	Claim Term(s)	Parties’ Agreed-Upon
’096: 1, 2, 3, 6, 7, 13 ’218: 1, 6	backbuffer	a memory location where the data is temporarily ‘drawn’ without a memory card

Disputed Terms for Construction

Claim(s)	Term(s)	Techno View’s Proposed Construction	Techno View’s Citations to Intrinsic Evidence	Defendants’ Proposed Construction	D
’096: 1, 5, 8, 12, 16 ’218: 1, 2, 7, 8	“videogame”	<p><i>A software program written in some computer language, with its objective to simulate a non-existent world and take a player or user into this world.</i></p> <p>Alternatively, Plaintiff respectfully asserts that the term, in context in the claim language, is readily understood by lay persons so no construction is necessary.</p>	<p>“Any videogame is a software program written in some computer language. Its objective is to simulate a non-existent world and take a player or user into this world. Most videogames are focused in enhancing the visual and manual dexterity, pattern analysis and decision taking, in a competitive and improvement (difficulty level) environment, and are presented in large scenarios with a high artistic content. As a game engine, most videogames are divided into the following structure: videogame, game library with graphics and audio engines associated, the graphical engine contains the 2D source code and the 3D source code, and the audio engine contains the effects and music code. Every</p>	<p>a process which starts by providing a plurality of independently related logical states which include a set of programming options, where each programming option corresponds to different image characteristics</p>	<p>’096 are p prov inde state prog each corro char</p>

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			<p>block of the game engine mentioned is executed in a cyclic way called a game loop, and each one of these engines and libraries is in charge of different operations....” (Source: ’096 Patent: col 3, 53-67; ’218 Patent col 3, 53-67)</p> <p>See the plain reading of, e.g., the ’096 Patent: Claim 16, in the context of the term as used in the claim: “a videogame system configured to run instructions that when executed perform a method comprising the steps of”</p>		
<p>’096: 1, 2, 3, 6, 7 ’218: 1, 6</p>	<p>“left backbuffer” and “right backbuffer”</p>	<p>“left backbuffer” <i>A memory location where the left image to be displayed is temporarily stored.</i></p> <p>“right backbuffer” <i>A memory location where the right image to be displayed is temporarily stored</i></p> <p>Alternatively, Plaintiff respectfully asserts that the phrases, in context in the claim language, are readily understood by lay persons so no</p>	<p>“left backbuffer”</p> <p>Figure [FIG.] 4a shows the creation of memory locations for the temporary graphics processing (left and right backbuffers) in which basically it adds and extra memory location, i.e., sets a right buffer in (400) and discriminates in (401) if TDVision technology is present; in an affirmative case, it sets the left buffer in (402) and ends in (403); when TDVision technology is not present the process ends at (403), as there was nothing to discriminate.</p>	<p>backbuffers that are separate from each other such that left and right independent images could be generated and stored therein</p>	<p>’096 sum Sept “Ap two Eng not s that inde gene</p>

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		construction is necessary.	<p>Figure [FIG.] 4b shows the flowchart for the discrimination and display of the left camera and right camera image; the left view is set in (410), the image is drawn in the left backbuffer as a function of the camera position, the image is displayed in the left screen (412), then it is discriminated if it has TDVision format in (413) and in the affirmative case the right view position coordinates are calculated (414), the image is drawn in the right backbuffer as a function of the left camera position (415), then the image is displayed in the right screen(416), the process ends at (417).” (Source: see ‘098 Patent: col. 8, 48-65; ‘218 Patent: col. 8, 46-63)</p> <p>“A backbuffer is used, which is a memory location where the image to be displayed is temporarily "drawn" without outputting it to the video card. (Source: ‘096 Patent: col. 6, 40-42; ‘218 Patent: col. 6, 40-42)</p> <p>See the plain reading of, e.g., the ‘096 Patent: Claim 1, in the context of the term as used in the claim: “clearing the left and</p>		

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			<p>right backbuffers in the videogame system; storing an image into the left backbuffer ... when the image is in a three-dimensional format, calculating the coordinates of a second view position of the image and storing a second view position image into the right backbuffer.”</p> <p>See the plain reading of, e.g., the ‘096 Patent: Claim 1, in the context of the term as used in the claim: “clearing the left and right backbuffers in the videogame system; storing an image into the left backbuffer ... when the image is in a three-dimensional format, calculating the coordinates of a second view position of the image and storing a second view position image into the right backbuffer.”</p> <p><u>“right backbuffer”</u></p> <p>Figure [FIG.] 4a shows the creation of memory locations for the temporary graphics processing (left and right backbuffers) in which basically it adds an extra memory location, i.e., sets a right buffer in (400) and discriminates in</p>		

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