EXHIBIT A

PARTIES' PROPOSED CONSTRUCTIONS AND IDENTIFICATION OF EVIDENCE

	Term	Defendants' Proposed Construction and Evidence	IXI's Proposed Construction and Evidence
1	the ordering of method steps in claim 1	**Proposed Construction:** The following steps: "determining the level of complexity . . ." and "designating an application software" must be performed before the following steps: "wherein the high-level code is processed by a natural language compiler comprised of one or more modules executed on one or more independent computing systems, depending on the level of complexity . . ." and "wherein when the high-level code comprises a complex structure the parsing and determining steps are performed by application software executed on a network server . . ." **Intrinsic Evidence:** *See, e.g.*, '124 patent at Claim 1; 4:24-5:4; 6:13-8:7; Figs. 1, 3A, and 3B; 3/14/2007 Amendment at 3-7; 12/4/2007 Amendment at 2-4, 6-7. **Extrinsic Evidence:** Expert Testimony	**Proposed Construction:** No construction necessary **Intrinsic Evidence:** '124 patent at Claim 1 **Extrinsic Evidence:** Expert Testimony

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	Term	Defendants' Proposed Construction and Evidence	IXI's Proposed Construction and Evidence
2	"complex structure" / "less complex structure"	**Proposed Construction:** Indefinite **Intrinsic Evidence:** *See, e.g.*, '124 patent at 2:14-25; 4:15-5:4. **Extrinsic Evidence:** Expert Testimony	**Proposed Construction:** No construction necessary Alternatively, "high-level code that cannot be processed solely by application software installed and executed on the mobile device to produce executable code" / "high-level code that can be processed by application software installed and executed on the mobile device to produce executable code" **Intrinsic Evidence:** '124 patent at Claims 1 and 6; 4: 32-5: 4; 5:64-6:7; and any corresponding figures U.S. Patent No. 7,027,975 (cited during patent prosecution) [34: 31-58] **Extrinsic Evidence:** Expert Testimony
3	"high-level code"	**Proposed Construction:** Text formatted in a human-readable context, such as a natural language (e.g., English, French, Spanish, Japanese, etc.) **Intrinsic Evidence:** *See, e.g.*, '124 patent at Title; 1:8-11; 1:42-51; 2:26-31; 4:15-23; 4:42-45; 5:31-36; 6:8-12; Claim 1; Claim 6; Figs. 1-2.	**Proposed Construction:** No construction necessary. Alternatively, "naturally spoken or written text." **Intrinsic Evidence:** '124 Patent at (Claims 1 and 6; 4: 15-31; 6: 51-61; 8: 43-51; and any corresponding figures)

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	Term	Defendants' Proposed Construction and Evidence	IXI's Proposed Construction and Evidence
		Extrinsic Evidence: Expert Testimony *Webster's New World Dictionary of Computer Terms*, 8th ed. (2000) definition of "High-level programming language" *Newton's Telecom Dictionary*, 16th ed. (2000) definition of "High Level Languages" *Random House Webster's College Dictionary* (1999) definition of "High level" *Microsoft Computer Dictionary*, 4th ed. (1999) definition of "Code" *Webster's New World Dictionary of Computer Terms*, 8th ed. (2000) definition of "Code" *Webster's New World Dictionary of Computer Terms*, 8th ed. (2000) definition of "Source code"	U.S. Patent No. 7,027,975 (cited during patent prosecution) [1: 38-42] **Extrinsic Evidence:** Expert Testimony
4	the parsing and determining steps	**Proposed Construction:** Indefinite Alternatively: Refers to the "parsing the high-level code…", "determining at least one operation…", "determining whether high-level code…" and "determining level of complexity…" limitations. **Intrinsic Evidence:** *See, e.g.*, '124 patent at 4:24-6:7; Claim 1; 3/14/2007 Amendment at 3-7; 12/4/2007 Amendment at 2-4, 6-7.	**Proposed Construction:** No construction necessary **Intrinsic Evidence:** '124 Patent at Claim 1; 5: 44-63; and any corresponding figures **Extrinsic Evidence:** Expert Testimony

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	Term	Defendants' Proposed Construction and Evidence	IXI's Proposed Construction and Evidence
		Extrinsic Evidence: Expert Testimony	
5	"natural language compiler"	**Proposed Construction:** "A program that processes natural language to produce executable code." **Intrinsic Evidence:** *See, e.g.*, '124 patent at 4:24-66; 5:31-43; 6:8-12. **Extrinsic Evidence:** Expert Testimony *Webster's New World Dictionary of Computer Terms*, 8th ed. (2000) definitions of "Source code" and "Compiler" *Newton's Telecom Dictionary*, 16th ed. (2000) definition of "Compiler"	**Proposed Construction:** No construction necessary. Alternatively, "software that processes high-level code." **Intrinsic Evidence:** '124 patent at 4: 42-48; 8: 43-51; and any corresponding figures U.S. Patent No. 7,027,975 (cited during patent prosecution)[1: 38-42] **Extrinsic Evidence:** Expert Testimony "compile" – "To translate all or part of a program expressed in a high-level language into a computer program expressed in an intermediate language, an assembly language, or a machine language." IBM Dictionary of Computing (1994) "compiler" – "(1) A translator that can compile" IBM Dictionary of Computing (1994) "natural language" – "(1) A language whose rules are based on current usage without being specifically prescribed."

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	Term	Defendants' Proposed Construction and Evidence	IXI's Proposed Construction and Evidence
			IBM Dictionary of Computing (1994) "Natural language query" – "A query written in natural language (for example, plain English) seeking information from a database." Newton's Telecom Dictionary 20th ed. (2004) "Natural language (software)" – "A language whose rules are based on usage rather than being pre-established prior to the language's use. Examples include German and English." IEEE 100 The Authoritative Dictionary of IEEE Standards Terms, 7th ed. (2000)
6	"microcontroller"	**Proposed Construction:** "a single chip that can execute programs without any additional resources; not a microprocessor or microcomputer" **Intrinsic Evidence:** *See, e.g.*, '124 patent at 5:5-10; 7:33-38: **Extrinsic Evidence:** Expert Testimony Ted Van Sickle, *Programming Microcontrollers in C* 91 (1994) John B. Peatman, *Design with Microcontrollers* xiii (1988) Martin Bates, *PIC Microcontrollers* Introduction (2nd ed.	**Proposed Construction:** No construction necessary. Alternatively, "a chip that includes a processor." **Intrinsic Evidence** '124 patent at Claims 1 and 6; 5:5-10; 7:33-38; 8: 43-51; and any corresponding figures **Extrinsic Evidence:** Expert Testimony

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