Exhibit C: Defendants' Proposed Constructions and Identification of Evidence
TPL v. Matsushita et al., Civil Action No. 2:05-CV-494 (TJW)

Claim Terms for U.S. Pat. No. 5,809,336				
Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
1, 2, 6-10	microprocessor system	*No construction of the phrase is necessary.* *The preambles containing this phrase are not claim limitations.*	The claims themselves.	Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
3-5	microprocessor	*an electronic circuit that uses a central processing unit to interpret and execute programmed instructions*	The claims themselves; Title; Abstr.; Figs. 1-8, 14, 17-19; Col. 1, l. 60 - Col. 3, l. 35; Col. 16, l. 44 - Col. 17, l. 10.	Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
1-10	central processing unit	*the central electronic circuit in a computer that controls the interpretation and execution of programmed instructions*	The claims themselves;	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 318 (4th ed. 1989). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
1-2	an entire [ring oscillator	*a [ring oscillator variable*	The claims themselves;	Matthys, Robert J., Crystal

Claim Terms for U.S. Pat. No. 5,809,336				
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	variable speed system clock] in said single integrated circuit (claims 1-2)	*speed system clock] that is completely on-chip and does not rely on a control signal or an external crystal/clock generator*	Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33, 64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5; 4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082 (Pelgrom); U.S. Pat. No. 4,338,675 (Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229	Oscillator Circuits (1983) [MEI-ED00010233-MEI-ED00010279]; Cordell, Robert R. & Garrett, William G., *A Highly Stable VCO for Application in Monolithic Phase-Locked Loops*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-10, No. 6, Dec. 1975 [TPL-ED0398601 to 606]; Murthi, Enjeti N., *A Monolithic Phase-Locked Loop with Post Detection Processor*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-14, No. 1, Feb. 1979 [TPL-ED0400976 to 981]; Santos, Joseph T., *A One-Pin Crystal Oscillator for VLSI Circuits*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-19, No. 2, April 1984 [TPL-ED0405711 to 719]; Uzunoglu, Vasil & White, Marvin H., *The Synchronous Oscillator: A Synchronization*
3-4	an entire [ring oscillator system clock] constructed of electronic devices within the integrated circuit (claims 3-4)	*a [ring oscillator system clock] that is completely on-chip and does not rely on a control signal or an external crystal/clock generator*		
6-9	an entire [oscillator] disposed upon said integrated circuit substrate and connected to said central processing unit, said oscillator clocking (claims 6-9)	*an [oscillator] that is completely on-chip and does not rely on a control signal or an external crystal/clock generator*		

Claim Terms for U.S. Pat. No. 5,809,336				
Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
10	an entire [variable speed clock] disposed upon said integrated circuit (claim 10)	*a [variable speed clock] that is completely on-chip and does not rely on a control signal or an external crystal/clock generator*	(Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-10; 7/28/93 Amdmt., pp. 11-17.	*and Tracking Network*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-20, No. 6, Dec. 1985 [TPL-ED0407561 to 573]; Sleeckx, Frans V.J. & Sansen, Willy M.C., *A Wide-Band Current-Controlled Oscillator Using Bipolar-JFET Technology*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-15, No. 5, Oct. 1980 [TPL-ED0402669 to 675]; Fleischer, Paul E., et al., *A Switched Capacitor Oscillator with Precision Amplitude Control and Guaranteed Start-Up*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-20, No. 2, April 1985 [TPL-ED0407015 to 021]; Cordell, Robert R., et al., *A 50MHz Phase- and Frequency-Locked Loop*, IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. SC-14, No. 6, Dec. 1979 [TPL-ED0401776 to 783];

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Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
				MEAD & CONWAY, INTRODUCTION TO VLSI SYSTEMS 233-36 (1980) [MEI-ED00012333 to MEI-ED00012336]; MOHAMMED S. GHAUSI, ELECTRONIC DEVICES AND CIRCUITS: DISCRETE AND INTEGRATED 508 (1985); THE AMERICAN HERITAGE DICTIONARY 457, 1337 (1985); MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 763, 1339-40, 2016 (4th ed. 1989). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
1-10	oscillator	*a circuit that is capable of maintaining an alternating output*	The claims themselves; Figs. 17-19; Col. 3, ll. 27-35; Col. 16, l. 43 - Col. 17, l. 50.	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.
1-5	ring [oscillator]	*an [oscillator] having an odd*	The claims themselves;	Same extrinsic evidence as

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		number of inverting logic stages connected in a loop	Figs. 17-19; Col. 3, ll. 27-35; Col. 16, l. 43 - Col. 17, l. 50.	cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.
1-10	variable speed	*a speed (frequency) that is not tightly controlled and varies more than minimally*	The claims themselves; Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33, 64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5; 4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.

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Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
			(Pelgrom); U.S. Pat. No. 4,338,675 (Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229 (Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-10; 7/28/93 Amdmt., pp. 11-17.	
1-5	system clock	*a circuit that is itself responsible for determining the frequency of the signal(s) used for timing the operation of the CPU*	The claims themselves; Abstract; Col. 16, l. 43 - Col. 17, l. 50; Fig. 1, 5, 17; 4/11/96 Amdmt, p. 1-10; 2/6/98 Amdmt, p. 1-5.	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 366 (4th ed. 1989). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
6-9	oscillator...clocking	*an oscillator that is itself determining the frequency of the signal(s) used for timing*	The claims themselves; Abstract; Fig. 17; Col. 16, l. 43 - Col. 17, l. 50;	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single

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			4/11/96 Amdmt, p. 1-10; 2/6/98 Amdmt, p. 1-5.	integrated circuit" term.
10	clock	*a circuit that is itself responsible for determining the frequency of the signal(s) used for timing*	The claims themselves; Abstract; Fig. 17; Col. 16, l. 43 - Col. 17, l. 50; 4/11/96 Amdmt, p. 1-10; 2/6/98 Amdmt, p. 1-5.	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 366 (4th ed. 1989). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
1-2	processing frequency capability	*fastest safe operating speed (frequency) at which the CPU can operate*	The claims themselves; Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33, 64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5;	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.

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			4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082 (Pelgrom); U.S. Pat. No. 4,338,675 (Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229 (Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-10; 7/28/93 Amdmt., pp. 11-17.	
1-10	processing frequency	*fastest safe operating speed (frequency)*	The claims themselves; Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33,	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.

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			64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5; 4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082 (Pelgrom); U.S. Pat. No. 4,338,675 (Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229 (Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-	

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			10; 7/28/93 Amdmt., pp. 11-17.	
1-2 3-5 6-9 10	varying together (claims 1, 2) vary together (claims 3-5) varying . . . in the same way (claims 6-9) varying in the same way (claim 10)	*increasing and decreasing by the same amount*	The claims themselves; Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33, 64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5; 4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082 (Pelgrom); U.S. Pat. No. 4,338,675	WEBSTER'S NEW COLLEGIATE DICTIONARY (1973). Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.

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Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
			(Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229 (Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-10; 7/28/93 Amdmt., pp. 11-17.	
1-10	on-chip input/output interface	*a circuit having logic for input / output communications, where that circuit is located on the same semiconductor substrate as the CPU (claims 1, 6, 10) or the microprocessor (claim 3)*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 50; 12/12/95 OA, pp. 2-3; U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 977 (4th ed. 1989). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
1-5	second clock (claims 1-5);	*No construction necessary, but if construed:* *another clock*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 50; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9; 2/6/98 Amdmt, p. 3;	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 366 (4th ed. 1989); THE AMERICAN HERITAGE DICTIONARY 654 (1985).

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			4/23/98 Interview; U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
10	external clock (claim 10)	*No construction necessary, but if construed:* *a clock not on the integrated circuit substrate*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 50; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9; 2/6/98 Amdmt, p. 3; 4/23/98 Interview; U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS 366 (4th ed. 1989); THE AMERICAN HERITAGE DICTIONARY 654 (1985). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
6-9	[external clock], independent of said oscillator	*an [external clock] wherein a change in the frequency of one of the external clock or oscillator does not affect the frequency of the other*	The claims themselves; Figs. 1, 5, 17; Col. 17, ll. 32-37; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9; 2/6/1998 Amdmt, p. 3; 4/23/1998 Interview; U.S. Pat. No. 4,670,837 (Sheets);	THE AMERICAN HERITAGE DICTIONARY 654 (1985). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.

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			U.S. Pat. No. 4,453,229 (Schaire).	
1-2	[second clock] independent of said ring oscillator... system clock	*a [second clock] wherein a change in the frequency of one of the second clock or ring oscillator system clock does not affect the frequency of the other*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 37; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9; U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	THE AMERICAN HERITAGE DICTIONARY 654 (1985). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
3-5	[second clock] independent of the ring oscillator system clock	*a [second clock] wherein a change in the frequency of one of the second clock or ring oscillator system clock does not affect the frequency of the other*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 37; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9; U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	THE AMERICAN HERITAGE DICTIONARY 654 (1985). Defendants reserve the right to submit and rely on an expert declaration in rebuttal to any expert declaration submitted by Plaintiffs.
6-10	[external clock] is operative at a frequency independent of a clock frequency of said oscillator	*an [external clock] wherein a change in the frequency of one of the external clock or oscillator does not affect the frequency of the other (claim*	The claims themselves; Figs. 1, 5, 17; Col. 16, l. 43 - Col. 17, l. 37; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt, p. 9;	THE AMERICAN HERITAGE DICTIONARY 654 (1985). Defendants reserve the right to submit and rely on an expert

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		6)	U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 4,453,229 (Schaire).	declaration in rebuttal to any expert declaration submitted by Plaintiffs.
2, 4, 8	fixed-frequency	*having a speed (frequency) that varies minimally and is tightly controlled*	The claims themselves; Abstract; Col. 3, ll. 26-35; Col. 16, ll. 43 - Col. 17, l. 50; Figs. 1, 5, 17-19; 6/7/95 Orig. Appl., pp. 31-33, 64-83; 12/12/95 OA, pp. 2-3; 4/11/96 Amdmt., pp. 1-10; 7/8/96 OA, pp. 2-4; 1/8/97 Amdmt., pp. 1-5; 4/3/97 OA, p. 2; 7/3/97 Amdmt, p. 1-5; 10/16/97 OA, p.2-4; 2/6/98 Amdmt, p. 1-5; 4/24/98 Supp. Amdmt., pp. 1-3; 5/13/98 Interview Summ. Rec.; U.S. Pat. No. 4,503,500 (Magar); U.S. Pat. No. 4,627,082	Same extrinsic evidence as cited for "an entire [ring oscillator variable speed system clock] in said single integrated circuit" term.

Claim Terms for U.S. Pat. No. 5,809,336				
Claims	**Term**	**Defendants' Construction**	**Defendants' Intrinsic Evidence**	**Defendants' Extrinsic Evidence**
			(Pelgrom); U.S. Pat. No. 4,338,675 (Palmer); U.S. Pat. No. 4,680,698 (Edwards et al.); U.S. Pat. No. 4,453,229 (Schaire); U.S. Pat. No. 4,670,837 (Sheets); U.S. Pat. No. 5,440,749, file history 12/31/92 OA, pp. 1-10; 7/28/93 Amdmt., pp. 11-17.	