



1313 North Market Street  
P.O. Box 951  
Wilmington, DE 19899-0951  
302 984 6000

www.potteranderson.com

**Philip A. Rovner**  
Partner  
provner@potteranderson.com  
(302) 984-6140 Direct Phone  
(302) 658-1192 Fax

April 8, 2010

**PUBLIC VERSION – April 15, 2010**

**BY E-FILE AND HAND DELIVERY**

**PUBLIC VERSION**

The Honorable Leonard P. Stark  
U.S. District Court for the District of Delaware  
U.S. Courthouse  
844 N. King Street  
Wilmington, DE 19801-3556

Re: Leader Technologies, Inc. v. Facebook, Inc., C. A. No. 08-862-JJF(LPS)

Dear Judge Stark:

The facts surrounding Leader's March 9 production of NDAs, and the errata sheet provided by third party Jeffrey Lamb after his February 19 deposition undermine Facebook's attempt to strike evidence or re-open discovery. As more fully explained below, Facebook's request should be denied because Facebook was aware of the existence of these NDAs since at least April 2009, yet did not request them until February 2010. Moreover, these NDAs are not relevant to any claim or defense presented by Facebook in this action. Similarly, there is no legal basis for the requested relief regarding Mr. Lamb's errata sheet which clarifies his deposition responses.

**A. Leader's March 9 Production of NDAs**

Leader has an established business practice of obtaining an NDA from (1) all of its employees, (2) all actual and potential customers, investors, vendors and contractors, and (3) virtually all other individuals and entities with which it interacts. *See* Exhibit 1. Early in discovery, Leader produced hundreds of pages of documents to Facebook that discuss this NDA policy. *See* Exhibits 2-5 (exemplary documents produced to Facebook). Despite having knowledge of the existence of these NDAs since at least Leader's April 14, 2009 document production, Facebook never issued a document request or sent a letter to counsel seeking these types of NDAs. The document requests noted in Facebook's letter simply do not request these NDAs. Contrary to Facebook's assertion, Leader produced all documents responsive to the general requests that Facebook cites, including all documents that Facebook could have relied on for a public disclosure or on sale defense pursuant to 35 U.S.C. §102(b).<sup>1</sup> This included all

---

<sup>1</sup> Leader produced all documents responsive to Production Request No. 7 (validity of '761 Patent), Nos. 17-19 (any use of the patented invention), No. 21 (identity of actual or potential customers of the patented invention); No. 68 (conception, R&D and reduction to practice), Nos.

The Honorable Leonard P. Stark  
April 8, 2010  
Page 2

communications with customers, contracts, and marketing material for Leader2Leader and anything that referred to the '761 Patent or the patented technology.

The NDAs at issue are not relevant to any claim or defense alleged by Facebook. To date, Facebook has not alleged that the '761 Patent is invalid due to the on-sale or public disclosure provisions of 35 U.S.C. §102(b). This is probably due to the fact that it knew that Leader had an established business practice of obtaining NDAs for any type of discussion it had with any third party. If Facebook had made such an allegation, however, the NDAs would only be relevant to Leader's defenses to such a claim, as opposed to Facebook's affirmative allegation of invalidity. Facebook's Answer alleged that the '761 patent is invalid under §102. *See* Exhibit 6. Leader served Facebook with interrogatories requesting the basis for this allegation. Facebook supplied several responses to these requests, setting forth a highly detailed explanation of its §102 invalidity allegations. Exhibits 7-10, Responses 4 and 18. None of these allegations involved on-sale, prior public disclosure, or any other §102 claim that would make the NDAs nominally relevant. There is no basis in fact that Leader failed to produce relevant documents or has an obligation to produce documents to support defenses against an unasserted claim.

Furthermore, the NDAs, such as those attached to its letter, especially the unsigned or draft NDAs are not responsive to Facebook's document requests, such as No. 75, that requests "[a]ll documents and communications relating to Leader2Leader which refer to the '761 patent or the alleged invention embodied in the '761 patent." *See* Facebook's letter at 2. These NDAs do not discuss Leader2Leader, the '761 patent, or the invention embodied in the '761 patent. Although this is just one example, the connections between the NDAs at issue and the 10 other document requests to which Facebook claims these NDAs are responsive are equally tenuous.

Leader produced in good faith all NDAs it could locate, including drafts and irrespective to whether they were ever sent to a third party, to Facebook on March 9 in response to Facebook's request for all NDAs at the February 23 deposition on Michael McKibben as a professional courtesy. Most NDAs were in connection with potentially investing in Leader. Leader previously produced all relevant NDAs and those ordered by the Court.<sup>2</sup> Facebook rejected Leader's offer during the meet and confer process to provide Facebook with an additional day of deposition with Mr. McKibben regarding the NDAs at issue. Despite ample opportunity to request Leader's NDAs, Facebook failed to do so. Now, after Leader provided them as a courtesy and in good faith, Facebook is attempting to delay trial by inventing a "controversy" late in the case.

#### **B. Jeffrey Lamb's Deposition Errata**


Facebook's attempt to have Your Honor intervene regarding the Lamb errata is so legally and factually flawed that there are numerous reasons for denying its request.

1. *This issue is an evidentiary issue, and not a discovery dispute.* Facebook is attempting to cast an evidentiary issue as a discovery dispute. Facebook's concern does not address whether

---

72-73 (marketing, promotion, and customers of Leader2Leader), No. 74 (testing of Leader2Leader and early adopters), Nos. 75 (communications regarding Leader2Leader that refer to the patented technology), and No. 77 (reasons customers purchase or chose to use Leader2Leader).

<sup>2</sup> Facebook's claim that 10 of the NDAs at issue are relevant to litigation financing is incorrect.



The Honorable Leonard P. Stark  
April 8, 2010  
Page 3

Mr. Lamb's deposition will take place, where or when it will take place, or any other matter of discovery. Rather the concern relates to the quality and factual accuracy of Mr. Lamb's testimony - issues that are essentially evidentiary in nature and properly addressed by the trial court in a motion *in limine*.

2. *Facebook stipulated to Mr. Lamb's right to submit an errata to his testimony.* Mr. Lamb, a third party, was deposed pursuant to a subpoena issued by the Southern District of Ohio. See Exhibit 11. During deposition, Facebook's counsel and Mr. Lamb specifically agreed to permit changes and corrections to his transcript as follows:

Q. [REDACTED]

A. [REDACTED]

See Exhibit 12 at 6:25-7:5. To the extent Facebook claims Mr. Lamb's errata are substantive changes, Mr. Lamb did precisely what Facebook's counsel stipulated to. See Exhibit 13. Facebook is estopped from requesting any relief regarding Mr. Lamb's right to submit an errata.

3. *The Southern District of Ohio has jurisdiction over Mr. Lamb.* Mr. Lamb's deposition took place in Ohio pursuant to a subpoena issued by the Southern District of Ohio. Mr. Lamb has not agreed to another day of deposition, and Facebook has not proceeded with any motion to compel a second day of deposition from the Court in Ohio. Facebook's letter has no support for its assertion that this Court should strike part of a deposition that took place in a neighboring state, or that federal case law from Delaware is applicable to a procedural matter in Ohio. The proper location to bring a complaint about Mr. Lamb is in Ohio. See *DMS v. Trammochem*, 451 F.3d 89, 95 (2<sup>nd</sup> Cir. 2006)(New York cannot enforce or modify a subpoena issued on a Texas corporation).

4. *Mr. Lamb's errata did not change the substance of his testimony.* Rule 30(e) permits a deponent to make changes in the "form or substance" to a deposition transcript if the changes are done within 30 days and the deponent submits a signed "statement listing the changes and the reasons for making them. Fed. R. Civ. P. 30(e). Mr. Lamb's deposition took place in the Southern District of Ohio, a jurisdiction that allows a deponent to correct typographical or translation errors and substantively modify the testimony. See *United States v. Piqua Eng'g, Inc.*, 152 F.R.D. 565, 566-567 (S.D. Ohio 1993) ("under the Rule, changed deposition answers of any sort are permissible, even those which are contradictory or unconvincing, as long as the procedural requirements set forth in the Rule are also followed."); see also *Sauder Indus., Inc. v. The Carborundum Co. v. Alaska Interstate Co.*, 1980 WL 324461 at \*4 (N.D. Ohio 1980). Thus, even if Mr. Lamb's errata changes were substantive in nature, such a change in an errata sheet would be permitted under Ohio law.

However, the analysis above is largely academic for the simple reason that Lamb's errata sheet changes are not substantive. A review of the errata and his reasons demonstrates that he only made minor permissible clarifications to his testimony and submitted a document stating the reason for each clarification. See Exhibit 14. [REDACTED]

[REDACTED] These changes are simply not substantive because they do not contradict or significantly alter the answers Mr. Lamb provided in his deposition. Furthermore, even under Delaware law, such clarifications are permitted.

The Honorable Leonard P. Stark  
April 8, 2010  
Page 4

Respectfully,

*/s/ Philip A. Rovner*

Philip A. Rovner (#3215)  
[provner@potteranderson.com](mailto:provner@potteranderson.com)

PAR /mes/960860

Enc.

cc: Steven L. Caponi, Esq. – By E-File and E-mail  
Heidi L. Keefe, Esq. – By E-mail  
Paul J. Andre, Esq. – By E-mail

# **EXHIBIT 10**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

**EXHIBIT 11**

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the Southern District of Ohio

LEADER TECHNOLOGIES, INC., Plaintiff

v.

FACEBOOK, INC., Defendant

Civil Action No. 1:008-cv-00862-JJF

(If the action is pending in another district, state where: District of Delaware)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Jeffrey R. Lamb c/o King & Spalding 333 Twin Dolphin Drive Suite 400 Redwood Shores, CA 94065

Alternate (home) Address: 5012 Bancroft Drive Hilliard, OH 43026

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

SEE EXHIBIT A ATTACHED HERETO

Table with 2 columns: Place (Cooley Godward Kronish LLP, Five Palo Alto Square, 3000 El Camino Real, Palo Alto, CA 94307) and Date and Time (November 20, 2009, 9:00 a.m.)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: November 3, 2009

CLERK OF COURT

OR

Signature lines for Clerk/Deputy Clerk and Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) FACEBOOK, INC., who issues or requests this subpoena, are:

Jeffrey Norberg, jnorberg@cooley.com Cooley Godward Kronish, LLP, Five Palo Alto Square 3000 El Camino Real, Palo Alto, CA 94306 (650) 843-5000



AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:008-cv-00862-JJF

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)****(c) Protecting a Person Subject to a Subpoena.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(d) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) *Contempt.* The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

**EXHIBIT A TO SUBPOENA TO JEFFREY LAMB**

**DEFINITIONS**

A. "You" shall mean Jeffrey Lamb or other persons or entities acting or purporting to act for, or on behalf of Jeffrey Lamb.

B. "Documents" means all writings, recordings, and photographs, including the original, all drafts, and any and each copy bearing notations or marks not found on the original or draft, of any written, recorded or graphic matter, however produced or reproduced, including, but not limited to, any typed or printed matter, microfilm, photographs, maps, correspondence, electronic correspondence, letters, interoffice communications, diaries, calendars, memoranda insurance policies, contracts, checks, statements of account, receipts, summaries, notes, papers, files, books, records, telegrams, messages, reports, tables, graphs, computer printouts, tape recordings, charts, logs, ledgers, surveys, blue prints, engineering or architectural drawings or diagrams, studies, manuals, consultants' or experts' reports, resumes, exhibits, notices, instructions, minutes, purchase orders, financial records, accounting records, tax records, county or tax worksheets, magnetic tapes, and any other data compilations from which the information can be obtained or translated. The term "Documents" also includes all electronic media on which responsive information is stored or recorded, including, but not limited to, all computer databases, indexes, and e-mails.

C. "Communication" means any contact, oral or documentary, formal or informal, at any place or under any circumstances whatsoever whereby information of any nature is transmitted or transferred, including, without limitation, a single person seeing or hearing any information by any means.

**INSTRUCTIONS**

1. Each document is to be produced along with all drafts thereof in its entirety, without abbreviation or redaction.
2. In the event that any document called for by the Requests is to be withheld on the basis of a claim of privilege or work product protection, that document shall be identified by stating (i) each addressor and addressee, (ii) any indicator or blind copy; (iii) the document's date, subject matter, number of pages and attachments or appendices; (iv) all persons to whom the document was distributed, shown or explained; (v) its present custodian; and (vi) the nature of the privilege being claimed.
3. In the event that any document called for by these Requests has been lost, destroyed or discarded, that document is to be identified by stating: (i) any addressor and addressee; (ii) any indicated or blind copies (iii) the document's date, subject matter, number of pages and attachments or appendices; (iv) all persons to whom the document was distributed, shown or explained; (v) the date of loss, destruction or discard, manner of destruction or discard, and reason for destruction or discard; (vi) the persons who were authorized to carry out such destruction or discard; and (vii) whether any copies of the document presently exist and if so, the name of the custodian of each copy.
4. These Requests shall be deemed continuing so as to require further and supplemental production in accordance with the Federal Rules of Civil Procedure.

**DOCUMENTS AND THINGS REQUESTED**

1. All Documents that refer to, relate to and/or mention Leader Technologies, Inc., Leader Technologies, LLC, and/or Michael McKibben.
2. All Communications that refer to, relate to, or comprise any communications between you and Leader Technologies, Inc. and/or Michael McKibben and/or Computer Wizards Consulting Inc. and/or anyone acting on Leader Technologies, Inc.'s or Michael McKibben's or Computer Wizards Consulting Inc.'s behalf.

3. All Documents or Communications that refer to, relate to, or comprise any communications between Computer Wizards Consulting Inc. and Leader Technologies, Inc.

4. All Documents or Communications that refer to, relate to, comprise and/or mention U.S. Patent No. 7,139,761 and/or any litigation considered or commenced involving U.S. Patent No. 7,139,761.

5. All Documents or Communications that refer to, relate to, or comprise any agreements or communications between you and any other person or entity that refer to, relate to and/or mention U.S. Patent No. 7,139,761 and/or any litigation considered or commenced involving U.S. Patent No. 7,139,761.

6. All Documents or Communications that refer to, relate to and/or mention the validity and/or invalidity of U.S. Patent No. 7,139,761.

7. All Documents or Communications that refer to, relate to and/or mention the application(s) leading to U.S. Patent No. 7,139,761 and any related patent application(s), including any WIPO, EPO or other foreign counterpart applications or patents, any continuations, continuations-in-part, divisionals, reissues, reexaminations, extensions or parents thereof.

8. All Documents or Communications that refer to, relate to, mention and/or comprise any actual or purported prior art to U.S. Patent No. 7,139,761 and/or U.S. Patent Application No. 10/732,744 and/or Provisional U.S. Patent Application No. 60/432,255, including all patents, publications, written descriptions, products or other prior art.

9. All Documents or Communications that purport to identify actual or purported prior art to U.S. Patent No. 7,139,761 and/or U.S. Patent Application No. 10/732,744 and/or Provisional U.S. Patent Application No. 60/432,255.

10. All Documents constituting the results of any search for prior art to U.S. Patent No. 7,139,761 and/or U.S. Patent Application No. 10/732,744 and/or Provisional U.S. Patent Application No. 60/432,255.

11. All Documents or Communications that refer to, relate to and/or mention the conception, design, research, experimental work, development, reduction to practice, examination, analysis, testing and/or evaluation of any product, system, process or method related to the invention(s) claimed in U.S. Patent No. 7,139,761.

12. All Documents or Communications that refer to, relate to and/or mention the conception, design, research, experimental work, development, reduction to practice, examination, analysis, testing and/or evaluation of any product, system, process or method related to Digital Leaderboard and/or Leader2Leader.

13. All Documents or Communications that refer to, relate to and/or mention the invention(s) claimed in U.S. Patent No. 7,139,761.

14. All Documents or Communications that refer to, relate to and/or mention Digital Leaderboard and/or Leader2Leader.

15. All Documents or Communications that refer to, relate to and/or mention any use of the alleged invention(s) described in U.S. Patent No. 7,139,761.

16. All Documents or Communications that refer to, relate to and/or mention the first use, disclosure, display, demonstration, and/or first sale or offer for sale of the alleged invention(s) disclosed, described or claimed in U.S. Patent No. 7,139,761, or of services utilizing any of said invention(s).

17. All Documents or Communications that refer to, relate to and/or mention any alleged infringement by any party of U.S. Patent No. 7,139,761, including, but not limited to, any infringement analyses.

18. All Documents dating from 2004 to the present that refer to, relate to and/or mention Facebook, Inc., TheFacebook LLC, and/or the websites available at facebook.com or thefacebook.com.

19. All Communications between you and any other person or entity that refer to, relate to and/or mention Facebook, Inc., TheFacebook LLC, and/or the websites available at facebook.com or thefacebook.com.

20. All Documents or Communications that refer to, relate to, and/or mention any infringement of U.S. Patent No. 7,139,761 by Facebook, Inc. and/or the website available at facebook.com, including, but not limited to, infringement analyses.

21. Documents sufficient to show the identity of any parties alleged by Leader Technologies, Inc., Michael McKibben, or you to infringe U.S. Patent No. 7,139,761.

22. All Documents or Communications that refer to, relate to and/or mention any contemplated litigation for infringement of U.S. Patent No. 7,139,761 against Facebook, Inc. and/or the website available at facebook.com, including, but not limited to, any infringement analyses or damages estimates. This request includes but is not limited to Documents that refer to or relate to Facebook that do not on their face contain the word "Facebook," such as documents referring to Facebook as "Target A" or any other name.

23. All Documents or Communications that refer to, relate to, memorialize and/or mention the acquisition, assignment, or encumbrance of any right in U.S. Patent No. 7,139,761.

24. All Documents or Communications that refer to, relate to, comprise, memorialize and/or mention any license(s) granted under U.S. Patent No. 7,139,761 and/or offers to grant a license under said patent, including but not limited to documents reflecting any license fees obtained in connection with said patent.

**EXHIBIT 12**



**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

---

**EXHIBIT 13**

---

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

---

## **EXHIBIT 14**

---

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 1**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

## **EXHIBIT 2**



# LEADER

The Intellectual Capital Company™

## LEADER TECHNOLOGIES LLC

Spectrum Commerce Center  
921 Eastwind Drive, Suite 118  
Westerville, Ohio 43081  
(614) 890-1986 VOICE  
(614) 864-7922 FAX

Michael T. McKibben, Chairman & CEO  
mmckibben@leader.com  
www.leader.com

September 19, 2000

**To: Leader Members in Arizona**

## Re: Upcoming Leader Investment Opportunity Presentation in Tucson!

You are invited (along with qualified investor prospects you wish to invite) to attend a presentation I will give on the Leader Investment Opportunity along with Ben Zacks, our Vice Chairman, and Adam Steiger, a co-Founder in Tucson, Arizona.

Here are the details of the meetings:

### Tuesday, Sept. 26<sup>th</sup> – 6:30PM for 7:00PM

Sheraton Tucson Hotel & Suites - Eastgrove Room  
5151 East Grant Road Tucson, AZ 85712  
Tucson Contact: John C. Stevenson, Ph. (520) 299-3332

### Wednesday, Sept. 27<sup>th</sup> – 6:30PM for 7:00PM

Sheraton Tucson Hotel & Suites - Eastgrove Room  
5151 East Grant Road Tucson, AZ 85712  
Tucson Contact: Steve Hopkins, Ph. (520) 622-1900

### Meeting issues:

- **Member Invitations** - We're currently raising a \$10M round of financing and are therefore seeking to present to accredited investors who have been introduced to the company by current members. Current members are welcomed to attend and are asked to RSVP and make the NDA arrangements mentioned below.
- **RSVP** - Please let us know here at the Leader office or call the Tucson contact person if you're going to attend.
- **Non-disclosure Agreement** - We will be presenting confidential trade secrets, so new investor prospects will need to have signed a Non-disclosure Agreement (NDA), so please call Carrie at our offices at (614) 890-1986 with the person's name and she'll fax you back the NDA for the person's signature
- **Food & Drink** - Like last time, we'll have plenty of hors d'oeuvres

See you then!

  
Mike

This is not an offer to purchase securities. Such investing can only occur through a formal subscription agreement. Consult with your legal and financial advisors before making any such investment.

# **EXHIBIT 3**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 4**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 5**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 6**



IN THE UNITED STATES COURT  
FOR THE DISTRICT OF DELAWARE

LEADER TECHNOLOGIES, INC., a Delaware corporation,	)	CIVIL ACTION
	)	
Plaintiff,	)	No. 1:08-cv-00862-JJF
	)	
v.	)	JURY TRIAL DEMANDED
	)	
FACEBOOK, INC., a Delaware corporation,	)	FACEBOOK'S SECOND AMENDED ANSWER TO COMPLAINT FOR
	)	PATENT INFRINGEMENT,
Defendant.	)	AFFIRMATIVE DEFENSES, AND COUNTERCLAIMS
	)	

Defendant and Counterclaimant FACEBOOK, INC. ("Facebook"), by and through its undersigned counsel, hereby submits its Second Amended Answer and Counterclaims to the Complaint for Patent Infringement filed by plaintiff LEADER TECHNOLOGIES, INC. ("LTI"):

ANSWER

The Parties

1. Facebook lacks sufficient information to admit or deny the allegations set forth in paragraph 1 of the Complaint and therefore denies them.
2. Facebook admits that it is a company organized and existing under the laws of the State of Delaware. Facebook denies that its corporate headquarters are located at 165 University Avenue, Palo Alto, California 94301. Facebook's principal place of business is located at 1601 S. California Avenue, Palo Alto, CA 94304-1111.

Jurisdiction and Venue

3. Admitted.
4. Facebook admits that venue is authorized in this judicial district under 28 U.S.C.

§§ 1391(b) and 1400(b), and that this Court has personal jurisdiction over Facebook. Except as expressly admitted herein, Facebook denies the remaining allegations of paragraph 4 of the Complaint.

**The Asserted Patent**

5. Facebook admits that United States Patent No. 7,139,761 (the "761 patent") is entitled "Dynamic Association of Electronically Stored Information with Iterative Workflow Changes." Facebook admits that a copy of the '761 patent was attached to the Complaint as Exhibit A. Facebook denies that the '761 patent was duly and legally issued. Except as expressly admitted herein, Facebook lacks sufficient information to admit or deny the remaining allegations of paragraph 5 of the Complaint and therefore denies them.

6. Facebook lacks sufficient information to admit or deny the allegations of paragraph 6 of the Complaint and therefore denies them.

**Alleged Infringement**

7. Facebook admits that it operates a web site that can be found on the World Wide Web at <http://www.facebook.com>. Except as expressly admitted herein, Facebook denies the remaining allegations of paragraph 7 of the Complaint.

**First Cause of Action**

**(Alleged Infringement of the '761 Patent)**

8. Facebook incorporates by reference all preceding paragraphs of this Answer as if fully set forth herein.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

**Prayer For Relief**

13. Facebook incorporates by reference all preceding paragraphs of this Answer as if fully set forth herein. Facebook denies that LTI is entitled to any relief sought in LTI's Prayer for Relief against Facebook, or otherwise.

**AFFIRMATIVE DEFENSES**

**First Affirmative Defense: Non-Infringement**

14. Facebook is not infringing and has not infringed any claim of the '761 patent, either literally or under the doctrine of equivalents.

**Second Affirmative Defense: Invalidity**

15. On information and belief, each claim of the '761 patent is invalid for failure to meet one or more of the conditions of patentability specified in 35 U.S.C. §§ 101-103 and/or 112.

**Third Affirmative Defense: Failure to State a Claim**

16. The Complaint fails to state a claim upon which relief can be granted.

**Fourth Affirmative Defense: Laches**

17. The Complaint and each of the allegations therein do not entitle plaintiff to relief on the grounds that, on information and belief, LTI's claims are barred by the doctrine of laches due to LTI's knowledge of Facebook's allegedly infringing actions, LTI's inexcusable failure to pursue its infringement claims diligently and timely from the time it became aware it had claims against Facebook, and by virtue of the fact that Facebook has been both economically and materially prejudiced and/or injured from LTI's inexcusable lack of diligence, including (but not limited to) through the loss of records of third parties pertaining to the prior art, and the

unreliability of the memories of witnesses who otherwise possess knowledge of the technology at issue.

**Fifth Affirmative Defense: No Injunctive Relief**

18. Plaintiff's demand to enjoin Facebook is barred, as plaintiff has suffered neither harm nor irreparable harm from Facebook's actions.

**Sixth Affirmative Defense: Prosecution History Estoppel**

19. On information and belief, prosecution history estoppel and/or prosecution disclaimer precludes any finding of infringement.

**Seventh Affirmative Defense: Marking of the '761 Patent**

20. Plaintiff's pre-lawsuit claims for damages are barred, in whole or in part, for failure to comply with 35 U.S.C. § 287.

Facebook reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Patent Laws of the United States and any other defenses, at law or in equity, that may now exist or in the future be available based on discovery and further factual investigation in this case.

**COUNTERCLAIMS**

Defendant and counterclaimant FACEBOOK, INC. ("Facebook"), by and through their undersigned counsel, hereby allege the following counterclaims against plaintiff and counterclaim-defendant LEADER TECHNOLOGIES, INC. ("LTI"):

**The Parties**

1. Facebook is a corporation organized and existing under the laws of the State of Delaware, having its principal place of business at 1601 S. California Avenue, Palo Alto, CA 94304-1111.

2. Facebook is informed and believes and on that basis alleges that counterclaim-defendant LTI is a corporation organized and existing under the laws of the State of Delaware having its principal place of business at 921 Eastwind Drive, Suite 118, Westerville, Ohio 43081.

**Jurisdiction and Venue**

3. This is a civil action seeking relief under two federal statutes: the Declaratory Judgment Act, 28 U.S.C.A. § 2201 *et seq.*, regarding allegations of patent infringement arising under the patent laws of the United States; and the federal patent false marking statute, 35 U.S.C. § 292. This Court has subject matter jurisdiction over these matters pursuant to 28 U.S.C. §§ 1331, 1338, 2201 and 2202.

4. The Court has personal jurisdiction and venue over LTI because LTI consented to personal jurisdiction and venue by filing the Complaint in this action.

**Actual Controversy**

5. LTI claims to be the assignee of the complete interest in United States Patent No. 7,139,761 (the "'761 patent"), entitled "Dynamic Association of Electronically Stored Information with Iterative Workflow Changes." LTI has alleged that Facebook has infringed and is infringing the '761 patent, a contention Facebook denies.

6. An actual controversy, within the meaning of 28 U.S.C. §§ 2201 and 2202, exists between Facebook and LTI. Facebook seeks a declaration that it does not infringe the '761 patent, that the '761 patent is invalid, and that LTI's claims under the '761 patent are barred.

**Count I**

**(Declaratory Judgment of Non-infringement of U.S. Patent No. 7,139,761)**

7. Facebook incorporates by reference all preceding paragraphs of this Counterclaim as if fully set forth herein.

8. Facebook does not infringe and has not infringed any claim of the '761 either

literally or under the doctrine of equivalents and therefore is not liable for infringement thereof. Furthermore, LTI's claims under the '761 Patent are barred for the reasons set forth in Facebook's Affirmative Defenses set forth above.

**Count II**

**(Declaratory Judgment of Invalidity and/or Unenforceability of U.S. Patent No. 7,139,761)**

9. Facebook incorporates by reference all preceding paragraphs of this Counterclaim as if fully set forth herein.

10. The '761 patent and each claim thereof are invalid and/or unenforceable for the reasons set forth in Facebook's Affirmative Defenses set forth above.

**Count III**

**(False Marking under 35 U.S.C. § 292)**

11. Facebook incorporates by reference all preceding paragraphs of this Counterclaim as if fully set forth herein.

12. LTI designs and sells, among other things, a product called "Leader2Leader® powered by Digital Leaderboard®" ("Leader2Leader").

13. On information and belief, LTI has marked the Leader2Leader product itself, as well as advertising, marketing and promotional materials for Leader2Leader, with the '761 patent since at least November 2006.

14. On information and belief, Leader2Leader does not practice the invention disclosed by the claims of the '761 patent.

15. On information and belief, LTI has been aware at all relevant times that Leader2Leader does not practice the invention disclosed by the claims of the '761 patent.

16. On information and belief, LTI has falsely affixed the '761 patent number to the Leader2Leader product and advertising, marketing and promotional materials for that product, for the purpose of deceiving the public and suppressing competition.

17. Pursuant to 35 U.S.C. § 292(b), Facebook is entitled to sue for the penalty for such false marking and receive one-half of such penalty.

Prayer For Relief

WHEREFORE, Facebook prays that this Court enter judgment:

- A. In favor of Facebook, and against LTI, thereby dismissing LTI's Complaint in its entirety, with prejudice, with LTI taking nothing by way of its claims;
- B. Declaring and adjudging that Facebook does not infringe the '761 patent;
- C. Declaring and adjudging that the '761 patent is invalid and/or unenforceable;
- D. Adjudging that LTI has falsely marked the Leader2Leader product in violation of 35 U.S.C. § 292;
- E. Ordering plaintiff to pay all costs incurred by Facebook in responding to this action, including Facebook's reasonable attorneys' fees pursuant to 35 U.S.C. § 285;
- F. Ordering plaintiff to pay the statutory penalty of \$500 for every offense of false marking;
- G. Awarding one-half of the penalty assessed for violation of 35 U.S.C. § 292 to Facebook; and
- H. Awarding Facebook all other relief the Court deems just and proper.

///





# **EXHIBIT 7**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 8**

**THIS EXHIBIT HAS BEEN  
REDACTED IN ITS ENTIRETY**

# **EXHIBIT 9**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LEADER TECHNOLOGIES, INC., a  
Delaware corporation,

Plaintiff-Counterdefendant,

v.

FACEBOOK, INC., a Delaware corporation,

Defendant-Counterclaimant.

Civil Action No. 08-862-JJF/LPS

**DEFENDANT FACEBOOK, INC.'S  
RESPONSES TO  
PLAINTIFF LEADER TECHNOLOGIES,  
INC.'S FOURTH SET OF  
INTERROGATORIES**

**PROPOUNDING PARTY: LEADER TECHNOLOGIES, INC.**

**RESPONDING PARTY: FACEBOOK, INC.**

**SET NUMBER: FOURTH (4)**

Pursuant to Federal Rules of Civil Procedure 33, defendant and counterclaimant FACEBOOK, INC. hereby submits the following objections and responses to LEADER TECHNOLOGIES, INC.'s ("LTP") Third Set of Interrogatories (Nos. 18). The responses contained herein are based on information reasonably available to Facebook as of the date of the response. Facebook's investigation is continuing and ongoing and Facebook expressly reserves the right to revise and/or supplement these responses.

**I. GENERAL OBJECTIONS.**

The following General Objections apply to each interrogatory and are hereby incorporated by reference into the individual response to each request, and shall have the same force and effect as if fully set forth in the individual response to each interrogatory.

1. Facebook objects to each interrogatory to the extent it purports to require Facebook to do anything beyond what is required by the Federal Rules of Civil Procedure, the Local Rules of this Court, and other applicable law.

2. Facebook objects to Plaintiff's "Instructions" to the extent they seek to impose

obligations beyond those permitted by the Federal Rules of Civil Procedure, the Local Rules of Court, or other applicable law.

3. Facebook objects to each interrogatory to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, and/or any other applicable privilege or immunity.

4. Facebook objects to each interrogatory to the extent it is phrased in a manner that would render it overly broad, vague or ambiguous, or would require subjective judgment or speculation on the part of Facebook. Facebook responds to these requests by construing them in light of the scope of the issues in this action.

5. Facebook objects to each interrogatory to the extent it seeks to elicit information that is subject to a right of privacy under the relevant provisions of federal and state law.

6. Facebook objects to each request to the extent it seeks to elicit third-party confidential information.

7. Facebook objects to each interrogatory to the extent it purports to place an obligation on Facebook to obtain information that is as readily available to Plaintiff as it is to Facebook.

8. Facebook objects to each interrogatory to the extent it calls for information not in the possession, custody or control of Facebook.

9. Facebook objects to each interrogatory to the extent it seeks privileged information originating on or subsequent to the commencement of this lawsuit. Given the burden and expense to Facebook involved in creating a privilege log in accordance with Instruction C, Facebook objects to logging information originating on or subsequent to the commencement of the lawsuit.

10. Facebook objects to each interrogatory to the extent it is not properly limited in time and/or improperly attempts to capture information, if any, created prior to issuance of the '761 patent.

**II. SPECIFIC OBJECTION AND RESPONSES.**

**INTERROGATORY NO. 18:**

For Facebook's contention that each of Leader's asserted claims are invalid because they lack novelty and/or are obvious under 35 U.S.C. §§ 102 and 103, provide a chart or charts that specifically identify where each limitation of each asserted claim of the '761 patent is found in each and every prior art reference upon which Facebook intends to rely and a complete description of why and how each limitation of each claim is allegedly anticipated and/or rendered obvious by such prior art.

**RESPONSE TO INTERROGATORY NO. 18:**

Facebook incorporates each of its General Objections herein by reference. Facebook further objects to this Interrogatory to the extent it calls for expert testimony or legal conclusions. Expert discovery has not commenced in this action. This Response is without prejudice to Facebook's right to designate one or more fact or expert witnesses in accordance with the Court's scheduling order, and to offer testimony from them to explain the prior art references cited in this response and further elucidate the bases of Facebook's contentions that that art renders the asserted claims of the '761 patent are invalid under 35 U.S.C. §§ 102, 103. Facebook's search for prior art is ongoing and Facebook reserves its right to supplement this response in the event additional prior art is located. Facebook further reserves its right to supplement its Response to this Interrogatory following the exchange of claim construction contentions and/or a claim construction ruling in this case.

Facebook objects to this Interrogatory to the extent it calls for information pertaining to claims of the '761 patent that have not properly been asserted in this litigation. In particular, LTI's further supplemental response to Facebook Interrogatory No. 1 (dated October 28, 2009) improperly attempted to add several claims to this litigation that were never previously asserted,



including without limitation an additional independent claim. Facebook is currently meeting and conferring with LTI regarding these additional claims and whether they will remain in this litigation. Facebook has not had an opportunity to fully analyze the invalidity of many of these new claims or to undertake a prior art search as to them. Facebook therefore reserves its right to supplement its response to this Interrogatory to address those claims in the event they are deemed to be part of this litigation.

Subject to and without waiving its objections, Facebook responds as follows:

The prior art references listed below render one or more of the asserted claims of the '761 patent invalid due to lack novelty and/or obviousness under 35 U.S.C. §§ 102 and 103:

- U.S. Patent No. 7,366,990 to Satyan G. Pitroda, entitled "Method and System for Managing User Activities and Information Using a Customized Computer Interface," filed on Jan. 19, 2001 and granted on Apr. 29, 2008 ("Pitroda '990")
- U.S. Patent No. 6,236,994 to Ronald M. Swartz et al., entitled "Method and Apparatus for the Integration of Information and Knowledge," filed on Jun. 29, 1998 and granted on May 22, 2001 ("Swartz '994")
- U.S. Patent No. 6,370,538 to John O. Lamping et al., entitled "Direct Manipulation Interface for Document Properties," filed on Nov. 22, 1999 and granted on Apr. 9, 2002 ("Lamping '538")
- U.S. Patent No. 6,308,179 to Karin Petersen et al., entitled "User Level Controlled Mechanism Inter-Positioned in a Read/Write Path of a Property-Based Document Management System," filed on Aug. 31, 1998 and granted on Oct. 23, 2001 ("Petersen '538")
- U.S. Patent No. 6,941,313 to Robert Seliger et al., entitled "Context Management with Audit Capability," filed on Dec. 11, 2001 and granted on Sep. 6, 2005 ("Seliger '313")
- U.S. Patent No. 7,346,648 to Robert Seliger, entitled "Context Management Server Appliance," filed on May 30, 2000 and granted on Mar. 18, 2008 ("Seliger '648")
- U.S. Patent No. 5,731,813 to Thomas C. O'Rourke et al., entitled "Graphical User Interface for Graphically Representing, Organizing, and Selecting Application Programs and Documents," filed on Jun. 6, 1994 and granted on Mar. 24, 1998 ("O'Rourke '813")

- U.S. Patent Application No. 10/017,181 to L. Michael Maritzen et al., entitled “Consumer-Centric Context-Aware Switching Model,” filed on Dec. 7, 2001 (“Maritzen ’181”)
- U.S. Patent No. 6,256,032 to Harlan M. Hugh, entitled “Method and Apparatus for Organizing and Processing Information Using a Digital Computer,” filed on Jan. 19, 2000 and granted on Jul. 3, 2001 (“Hugh ’032”)
- U.S. Patent Application No. 09/899,534 to Charles English Henderson et al., entitled “Method and System for Collaborative Knowledge Management,” filed on Jul. 6, 2001 (“Henderson ’534”)
- U.S. Patent No. 7,275,220 to Tony Brummel et al., entitled “System and Method for a Seamless User Interface for an Integrated Electronic Health Care Information System,” filed on Dec. 5, 2001 and granted on Sep. 25, 2007 (“Brummel ’220”)
- U.S. Patent No. 7,343,365 to Shelly D. Farnham et al., entitled “Computer System Architecture for Automatic Context Associations,” filed on Jun. 28, 2002 and granted on Mar. 11, 2008 (“Farnham ’365”)
- U.S. Patent No. 6,691,118 to R. Scott Gongwer et al., entitled “Context Management System for Modular Software Architecture,” filed on Oct. 31, 1997 and granted on Feb. 10, 2004 (“Gongwer ’118”)
- Eva Schroeter and Jon D. Patrick, “An Application Interface with Multiple Works: The Context Switcher,” Computer-Human Interaction – Australian conference, 6<sup>th</sup> OZCHI Proceedings (1996), pp. 318-19 (“Schroeter”).
- U.S. Patent No. 7,206,791 to John R. Hind et al., entitled “System and Method for Managing and Securing Meta Data,” filed on Jan. 17, 2002 and granted on Apr. 17, 2007 (“Hind ’791”)
- U.S. Patent No. 7,483,908 to Robert Seliger et al., entitled “Context Management with Audit Capability,” filed on Mar. 4, 2005 and granted on Jan. 27, 2009 (“Seliger ’908”)
- U.S. Patent No. 7,231,596 to Dov Koren, entitled “Collaborative, Fault-Tolerant, Scaleable, Flexible, Interactive Real-Time Display and Processing Method and Apparatus,” filed on Nov. 29, 2001 and granted on Jun. 12, 2007 (“Koren ’596”)
- U.S. Patent No. 6,990,513 to Joseph Belifore et al., entitled “Distributed Computing Services Platform,” filed on Jun. 22, 2001 and granted on Jun. 24, 2006 (“Belifore ’513”)

- U.S. Patent No. 6,917,938 to Gabriel O. Shea et al., entitled “Collaborative Context Information Management System,” filed on May 4, 2002 and granted on Jun. 12, 2005 (“Shea ’938”)
- U.S. Patent No. 6,873,990 to Daniel A. Oblinger, entitled “Customer Self-Service Subsystem for Context Cluster Discovery and Validation,” filed on Feb. 7, 2001 and granted on Mar. 29, 2005 (“Oblinger ’990”)
- U.S. Patent No. 7,325,032 to Sarah E. Zuberec et al., entitled “System and Method for Passing Context-Sensitive Information from a First Application to a Second Application on a Mobile Device,” filed on May 18, 2001 and granted on Jan. 29, 2008 (“Zuberec ’032”)
- U.S. Patent No. 7,590,934 B2 to Laurence Hubert et al., entitled “Meta-Document and Method of Managing,” filed on January 27, 2004 as a continuation of U.S. Patent Appl. No. 09/404,174 filed on September 24, 1999, and granted on September 15, 2009 (“Hubert ’934”).
- EP 1 087 306 A2 to Laurence Hubert et al., entitled “Meta-Documents and Method of Managing Them,” published on March 28, 2001 (“Hubert EP ’306”). Hubert EP ’306 is the European counterpart to Hubert ’934 (above), and both share substantially identical disclosures. Accordingly, citations to Hubert ’934 below should be understood as encompassing parallel portions of Hubert EP ’306.
- W.J. Johnson and O.W. Weber, *Method for Automatic Invocation to an Application Context in Correlation to Another Application Context*, IBM TECHNICAL DISCLOSURE BULLETIN, Vol. 37 No. 02B, p. 187 (Feb. 1994) (“Johnson”)
- Catherine E. Chronaki, Dimitrios G. Katakakis, Xenophone C. Zabulis, Manolis Tsiknakis and Stelios C. Orphanoudakis, *WebOnCOLL: Medical Collaboration in Regional Healthcare Networks*, IEEE Transactions on Information Technology in Biomedicine, Vol. 1 No. 4, pp. 257-69 (Dec. 1997) (“Chronaki”)
- Paul Dourish, W. Keith Edwards, Anthony LaMarca, and Michael Salisbury, *Presto: An Experimental Architecture for Fluid Interactive Document Spaces*, ACM TRANSACTIONS ON COMPUTER-HUMAN INTERACTION, Vol. 6, Issue 2, pp. 131-61 (1999) (“Dourish Presto”)
- Paul Dourish, John Lamping, Tom Rodden, *Building Bridges: Customisation and Mutual Intelligibility in Shared Category Management*, PROCEEDINGS OF THE ACM CONFERENCE ON SUPPORTING GROUP WORK GROUP ’99 (Phoenix, AZ), pages 11-20 (1999) (“Dourish Building Bridges”).
- U.S. Patent No. 6,430,575 to J. Paul Dourish, John O. Lamping and Thomas Rodden entitled “Collaborative Document Management System with

Customizable Filing Structures that are Mutually Intelligible,” filed on September 10, 1999 and granted on August 6, 2002 (“Dourish ’575”)

- U.S. Patent No. 6,493,731 to Rachel Jones, Paul Dourish, Allan MacLean and Richard Bentley entitled “Document Management System for Recording and Viewing the History of Document use,” filed on January 27, 1999 and granted on December 10, 2002 (“Jones ’731”)
- U.S. Patent No. 6,324,551 to John O. Lamping et al. entitled “Self-Contained Document Management Based on Document Properties,” filed on August 31, 1998 and granted on November 27, 2001 (“Lamping ’551”)
- Christopher K. Hess and Roy H. Campbell, *A Context File System for Ubiquitous Computing Environments*, Technical Report No. UIUCDCS-R-2002-2285/UIIU-ENG-2002-1729A, University of Illinois at Urbana-Champaign, July 2002 (“Hess CFS”)
- Christopher Hess, *Context File System Users Manual*, University of Illinois at Urbana-Champaign, 2001 (“Hess Manual”)
- GaiaOS and Context-File System, discussed in Hess CFS, in public use and known in the United States no later than December 10, 2001 (“Gaia/CFS”)
- Microsoft Press Computer Dictionary (3d ed. 1997) (“Microsoft Dictionary”)
- John December et al., *World Wide Web Unleashed* 330-335 (2d ed. 1995) (“December”)
- Christopher K. Hess, *The Design and Implementation of a Context-Aware File System for Ubiquitous Computing Applications*, published Ph.D Thesis, University of Illinois at Urbana-Champaign (2003) (“Hess Thesis”)
- iManage MailSite 4.0.0 Installation and User Manual, iManage, Inc. (2002) (“iManage MailSite”)
- The iManage Document Management System, a software product for managing information and documents, which was on sale and in public use in the United States no later than December 10, 2001 (“iManage System”). The iManage System is described in the iManage MailSite 4.0.0 Installation and User Manual, and the iManage DeskSite User Reference Manual, both from iManage, Inc. (2002).<sup>1</sup>

---

<sup>1</sup> Facebook is currently working with Autonomy to locate additional documentation responsive to Facebook’s subpoena relating to iManage. In the event Autonomy locates additional materials relating to iManage, Facebook will produce those materials and supplement this Response to incorporate them.

- The Documentum Document Management System, on sale and in public use in the United States prior to December 11, 2001<sup>2</sup>
- U.S. Patent No. 6,732,148 to Julio Estrada et al., entitled “System and Method for Interconnecting Secure Rooms,” filed Dec. 28, 1999 and granted on May 4, 2004 (“Estrada ’148”)
- U.S. Patent No. 5,878,258 to Anthony C. Pizi et al., entitled “Seamless Application Interface Manager,” filed on May 6, 1996 and granted on Mar. 2, 1999 (“Pizi ’258”)
- U.S. Patent No. 6,240,429 to James D. Thornton et al., entitled “Using Attached Properties to Provide Document Services,” filed on Aug. 31, 1998 and granted on May 29, 2001 (“Thornton ’429”)
- U.S. Patent No. 6,324,551 to John O. Lamping et al., entitled “Self-Contained Document Management Based on Document Properties,” filed on Aug. 31, 1998 and granted on Nov. 27, 2001 (“Lamping ’551”)
- U.S. Patent No. 6,950,982 to James P. Dourish, entitled “Active Annotation Mechanism for Document Management Systems,” filed on Nov. 19, 1999 and granted on Sep. 27, 2005 (“Dourish ’982”)
- U.S. Patent No. 6,266,670 to Anthony G. LaMarca et al., entitled “User Level Accessing of Low-Level Computer System Operations,” filed on Aug. 31, 1998 and granted on Jul. 24, 2001 (“LaMarca ’670”)
- U.S. Patent No. 6,253,217 to James P. Dourish et al., entitled “Active Properties for Dynamic Document Management System Configuration,” filed on Aug. 31, 1998 and granted on Jun. 26, 2001 (“Dourish ’217”)
- U.S. Patent Application No. 10/046,409 to Victoria M Bellotti et al., entitled “User Interface for a Message-Based System Having Embedded Information Management Capabilities,” filed on Jan. 16, 2002 (“Bellotti ’409”)
- U.S. Patent No. 5,835,758 to Kumar S. Nochur et al., entitled “Method and System for Representing and Processing Physical and Conceptual Entities,” filed on Feb. 28, 1995 and granted on Nov. 10, 1998 (“Nochur ’758”)

---

<sup>2</sup> Facebook recently received a voluminous document production from EMC Corporation containing documentation for the Documentum Document Management System, which is being produced concurrently with this Response. Due to the timing and heavy volume of the EMC materials, however, Facebook was unable to provide citations in the claim chart that is a part of this Response. Facebook is continuing to review the materials from EMC’s production and will further supplement its response to this Interrogatory once that review has been completed.

- U.S. Patent No. 6,675,161 to Sean A. Suchter, entitled “Managing Changes to a Directory of Electronic Documents,” filed on May 4, 1999 and granted on Jan. 6, 2004 (“Suchter ’161”)
- U.S. Patent No. 6,941,302 to Sean A. Suchter, entitled “Managing Changes to a Directory of Electronic Documents,” filed on Aug. 14, 2003 and granted on Sep. 6, 2005 (“Suchter ’302”)
- U.S. Patent No. 5,666,490 to Dennis Gillings et al., entitled “Computer Network System and Method for Managing Documents,” filed on May 16, 1994 and granted on Sep. 9, 1997 (“Gillings ’490”)
- U.S. Patent No. 6,560,655 to Roger F. Grambihler et al., entitled “Synchronization Manager for Standardized Synchronization of Separate Programs,” filed on Jun. 22, 1999 and granted on May 6, 2003 (“Grambihler ’655”)
- U.S. Patent Application No. 10/677,297 to Michael John Sykes et al., entitled “Adaptively Interfacing with a Data Repository,” filed on Oct. 3, 2003 (“Sykes ’297”)
- U.S. Patent No. 7,058,892 to Bruce A. MacNaughton et al., entitled “Displayed Content from Multiple Servers,” filed on Feb. 20, 2002 and granted on Jun. 6, 2006 (“MacNaughton ’892”)
- U.S. Patent No. 5,930,801 to Brian C. Falkenhainer et al., entitled “Shared-Data Environment in Which Each File Has Independent Security Properties,” filed on Oct. 30, 1997 and granted on Jul. 27, 1997 (“Falkenhainer ’801”)
- U.S. Patent No. 6,760,721 to Jeffrey M. Chasen et al., entitled “System and Method of Managing Metadata Data,” filed on Apr. 14, 2000 and granted Jul. 6, 2004 (“Chase ’721”)
- U.S. Patent No. 5,008,853 to Sars A. Bly et al., entitled “Representation of Collaborative Multi-User Activities Relative to Shared Structured Data Objects in a Networked Workstation Environment,” filed on Dec. 2, 1987 and Apr. 16, 1991 (“Bly ’853”)
- U.S. Patent No. 6,562,076 to Warren K. Edwards et al., entitled “Extending Application Behavior Through Active Properties Attached to a Document in a Document Management System,” filed on Aug. 31, 1998 and granted on May 13, 2003 (“Edwards ’076”)
- U.S. Patent Application No. 10/465,678 to Michael Bensimmon, entitled “Process for Managing Context Data Using an Intermediate Server,” filed on Jun. 19, 2003 (“Bensimmon ’678”)

- U.S. Patent No. 6,330,573 to Michael P. Salisbury et al., entitled “Maintaining Document Identity Across Hierarchy and Non-Hierarchy File Systems,” filed on Aug. 31, 1998 and granted on Dec. 11, 2001 (“Salisbury ’573”)
- U.S. Patent No. 6,370,553 to Warren K. Edwards et al., entitled “Atomic and Molecular Documents,” filed on Aug. 31, 1998 and granted on Apr. 9, 2002 (“Edwards ’553”)
- U.S. Patent No. 6,397,231 to Michael P. Salisbury et al., entitled “Virtual Documents Generated via Combined Documents or Portions of Documents Retrieved from Data Repositories,” filed on Aug. 31, 1998 and granted on May 28, 2002 (“Salisbury ’231”)
- U.S. Patent No. 6,269,380 to Douglas B. Terry et al., entitled “Property Based Mechanism for Flexibility Supporting Front-End and Back-End Components Having Different Communication Protocols,” filed on Aug. 31, 1998 and granted on Jul. 31, 2001 (“Terry ’380”)
- U.S. Patent No. 6,434,403 to Michiel R. Ausems et al., entitled “Personal Digital Assistant with Wireless Telephone,” filed on Feb. 19, 1999 and granted on Aug. 13, 2002 (“Ausems ’403”)
- U.S. Patent Application No. 11/203,484 to Eric J. Horvitz et al., entitled “Schemas for a Notification Platform and Related Information Services,” filed on Aug. 12, 2005 (“Horvitz ’484”).

The following charts reflect the reasons the asserted claims are invalid in light of the prior art under 35 U.S.C. §§ 102, 103. The analysis contained in these charts does not necessarily reflect the construction that Facebook believes ought to be given to the asserted claims. This analysis instead reflects Facebook’s best understanding of LTI’s interpretation of the asserted claims, as reflected in LTI’s purported infringement contentions. And even under the construction that Facebook believes should be given to these claims, the claims are still invalid in light of the prior art.

The following charts indicate, for each element of each asserted claim, at least one location in a cited prior art reference at which the elements of a given claim element may be found. In many instances, the chart indicates that a element is be found separately in several different references; hence the multiple quotations for particular elements. The fact that multiple prior art references are cited for a particular element is not intended to suggest that the element is

found only through a combination. Rather, each citation fully discloses the element to which it refers. Moreover, the charts do not necessarily indicate every location within the particular prior art reference at which the given claim element may be found. Facebook reserves its right to rely on additional portions of each cited prior art reference to provide explanatory context, background or other detail for the reference or rebut arguments LTI may make regarding the content of that reference. Thus, when considering a citation provided to a particular prior art reference for a given claim element, the following points should be noted:

a. Citations to a particular structure or set of structures in a given figure should be understood as also referring to all identical, parallel, correlating, or corresponding structures or sets of structures in other figures in the reference or in the text of the reference which, in the interests of brevity, were not included.

b. Citations to a particular structure or set of structures in a given figure should be understood as also referring to the text in the reference that describes, explains, or elucidates upon the cited structure(s) or the given figure.

c. Citations to text in a reference should be understood as also referring to any figures, structures or embodiments described therein.

d. The fact that certain entries in the charts may include citations to multiple, alternative structures in a prior art reference should not be construed to mean that for the references for which only a single citation is provided, the above points do not apply. The above points are applicable to all entries in the following charts.

<b>Claim Language of '761 Patent</b>	<b>Invalidating Prior Art</b>
<p>1. A computer-implemented network-based system that facilitates management of data, comprising:</p>	<p>Belifore '513 at, e.g., col. 2-3, 28; fig. 1.                      Bellotti '409 at, e.g., abstract; p. 3; fig. 19; claim 11.                      Bensimmon '678 at, e.g., pp. 1, 3; claim 14.                      Bly '853 at, e.g., abstract; col. 1, 15; claim 18.                      Brummel '220 at, e.g., abstract; col. 2, 4.                      Chasen '721 at, e.g., abstract; col. 6; claim 1.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Chronaki at, e.g., abstract.</p> <p>Dourish '217 at, e.g., abstract.</p> <p>Dourish '575 at, e.g., Abstract, Fig. 1, col. 2-3 (summary), 3-4 (detailed description), <i>passim</i>.</p> <p>Dourish '982 at, e.g., abstract.</p> <p>Dourish Building Bridges at, e.g., Abstract, 14-16.</p> <p>Dourish Presto at, e.g., pp. 1, 7.</p> <p>Edwards '076 at, e.g., abstract.</p> <p>Edwards '553 at, e.g., abstract.</p> <p>Estrada '148 at, e.g., abstract; col. 8; fig. 1-6, 12-13; claim 1.</p> <p>Falkenhainer '801 at, e.g., abstract; fig. 3.</p> <p>Farnan '365 at, e.g., abstract; col. 1-2.</p> <p>Gaia/CFS, e.g., the GAIA/CFS system provided a method of managing information. See disclosures for Hess CFS.</p> <p>Gillings '490 at, e.g., abstract; col. 4.</p> <p>Gongwer '118 at, e.g., col. 1, 3; fig. 1.</p> <p>Grambihler '655 at, e.g., abstract; col. 2-4; fig. 1; claim 1.</p> <p>Henderson '534 at, e.g., abstract; pp. 1, 3-4; fig. 7; claim 1.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 5, <i>passim</i>.</p> <p>Hess Manual at, e.g., §§ 1, <i>passim</i>.</p> <p>Hess Thesis at, e.g., §§ 1.1, 1.2, 1.4, 2.1, 3.1, <i>passim</i>.</p> <p>Hind '791 at, e.g., abstract; col. 1, 3; fig. 1.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-3; fig. 1.</p> <p>Hubert '934 at, e.g., Abstract, col. 1-4.</p> <p>Hugh '032 at, e.g., abstract; col. 2, 26-27.</p> <p>iManage MailSite at, e.g., Chapter 2.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., Abstract, col. 2-3 (summary), 4-6.</p> <p>Koren '596 at, e.g., abstract; col. 5; fig. 1-2, 5A, 14.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2; claim 11.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>LaMarca '682 at, e.g., abstract.</p> <p>Lamping '538 at, e.g., col. 1.</p> <p>Lamping '551 at, e.g., Abstract, col. 7-8, 10-12, <i>passim</i>; claim 7.</p> <p>MacNaughton '892 at, e.g., abstract; claim 1.</p> <p>Maritzen '181 at, e.g., abstract; p. 5; claim 22.</p> <p>Nochur '758 at, e.g., col. 3-4, 9; claim 15.</p> <p>O'Rourke '813 at, e.g., abstract, col. 5; claims 1, 3, 5, 8, 10, 16, 20, 23, 30-32, 38-39.</p> <p>Oblinger '990 at, e.g., abstract; claim 1.</p> <p>Petersen '179 at, e.g., col. 1-2, 6.</p> <p>Pitroda '990 at, e.g., col. 1-2, 5, 7; claims 1, 12, 17, 22.</p> <p>Pizi '258 at, e.g., abstract; col. 6; claim 1.</p> <p>Salisbury '231 at, e.g., abstract; claim 16.</p> <p>Salisbury '573 at, e.g., abstract; claim 6.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 1-2, 9; fig. 7.</p> <p>Seliger '908 at, e.g., abstract; col. 3-4; claim 35.</p> <p>Shea '938 at, e.g., abstract.</p> <p>Suchter '161 at, e.g., abstract; fig. 1A-1B, 6.</p> <p>Suchter '302 at, e.g., abstract; fig. 1A-1B, 6.</p> <p>Swartz '994 at, e.g., col. 1, 3.</p> <p>Sykes '297 at, e.g., abstract.</p> <p>Terry '380 at, e.g., abstract.</p> <p>Thornton '429 at, e.g., abstract; claim 12</p> <p>Zuberec '032 at, e.g., abstract; col. 7.</p>
<p>a computer-implemented context component of the network-based system for capturing context information associated with user-defined data created by user interaction of a user in a first</p>	<p>Belifore '513 at, e.g., col. 3-4, 10-17, 20-21, 29-32; fig. 5.</p> <p>Bellotti '409 at, e.g., pp. 2-5, 11; claims 1-3, 6-8.</p> <p>Bensimmon '678 at, e.g., abstract; pp. 1, 3, 6; fig. 1-4.</p> <p>Bly '853 at, e.g., abstract; col. 1, 8-10, 17-19, 24, 28-29; fig.</p>

Claim Language of '761 Patent	Invalidating Prior Art
<p>context of the network-based system, the context component dynamically storing the context information in metadata associated with user-defined data, the user-defined data and metadata stored on a storage component of the network-based system; and a computer-implemented tracking component of the network-based system for tracking a change of the user from the first context to a second context of the network-based system and dynamically updating the stored metadata based on the change, wherein the user accesses the data from the second context.</p>	<p>2.            Brummel '220 at, e.g., col. 2-3, 6, 9-10; claim 1, 3, 8.            Chasen '721 at, e.g., abstract; col. 1-5, 11-16; fig. 2; claim 1.            Chronaki at, e.g., pp. 260-65; fig. 6-7.            Dourish '217 at, e.g., col. 7, 10, 16; fig. 1, 4.            Dourish '575 at, e.g., col. 3-9, figs. 1-7.            Dourish '982 at e.g., col. 3, 6-7.            Dourish Building Bridges at, e.g., Abstract, 14-19.            Dourish Presto at, e.g., fig. 1; pp. 4, 6-7, 10-11, 15-16, 18.            Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.            Edwards '553 at, e.g., abstract; col. 7, 9-11; fig. 1-2, 4, 9a-9b.            Estrada '148 at, e.g., abstract; col. 5, 8, 12, 17, 21, 27-28; fig. 1-6, 10, 12-15; Table 1-2; claim 1, 4, 6.            Falkenhainer '801 at, e.g., abstract; col. 3-7, 11-12.            Farnan '365 at, e.g., abstract; col. 1-4, 11-13; fig. 4-9; Table 1A, 1C; claim 1, 2, 4, 26.            Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.            Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10.            Gongwer '118 at, e.g., col. 3-4, 6-10; fig. 1; claims 1, 8, 14-15.            Grambihler '655 at, e.g., col. 1-2.            Henderson '534 at, e.g., abstract; pp. 1-4, 6-8; fig. 5, 7, 9; claims 1, 5, 7.            Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1 (inc. fig. 1), 2.2, 3, 3.1, 3.3, 4.1, 4.2, 4.3, 5, 6.            Hess Manual at, e.g., §§ 1, 2, 2.2, 2.2.1, 2.3.            Hess Thesis at, e.g., §§ 3.1, 3.2, 3.4, 3.4.1, 4.5, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 5.5.            Hind '791 at, e.g., col. 3, 5-8, 12; fig. 2; claims 1, 7, 50.            Horvitz '484 at, e.g., abstract; pp. 1-2, 6-7, 9, 14, 27-28, 30-31; fig. 1-5.            Hubert '934 at, e.g., col. 2-4, Fig. 1-2, col. 5-8.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Hugh '032 at, e.g., col. 5-6, 13, 20, 24, 27-28; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3-5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 2-3 (summary), 4-12 (description), figs. 2-12. claim 1.</p> <p>Koren '596 at, e.g., col. 1-2, 10, 14-15, 21-23; fig. 32, 35-36.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2, 10-11; fig. 3.</p> <p>LaMarca '682 at, e.g., abstract; col. 7-8, 10-12; fig. 1-2.</p> <p>Lamping '538 at, e.g., col. 1-2, 6-8.</p> <p>Lamping '551 at, e.g., abstract; col. 2, 9-16; fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 6-8, 16-19; fig. 1A-1B, 3-4; claim 12.</p> <p>Maritzen '181 at, e.g., abstract; pp. 3-4, 6; fig. 7-9; claims 6, 9-12, 20.</p> <p>Nochur '758 at, e.g., col. 5-7, 10, 13-14; fig. 2, 7.</p> <p>O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.</p> <p>Oblinger '990 at, e.g., abstract; col. 5-10; fig. 1-3, 5, 9-10; claim 1-2, 4-5, 8, 10-11.</p> <p>Petersen '179 at, e.g., col. 1, 3, 6-7, 9-10, 15, 26; fig. 5.</p> <p>Pitroda '990 at, e.g., col. 2, 5-6, 8, 13, 19; fig. 6; claims 1, 10, 12.</p> <p>Pizi '258 at, e.g., col. 2, 4-5, 7; claim 1, 5.</p> <p>Salisbury '231 at, e.g., col. 10-11, 16; fig. 1-2; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-11, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '313 at, e.g., col. 1, 3, 9.</p> <p>Seliger '648 at, e.g., col. 2-5, 7-9, 12; fig. 7.</p> <p>Seliger '908 at, e.g., abstract; col. 2-5, 8-9; fig. 1, 4, 7; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 6, 8; fig. 1; claim 1, 4, 6, 12, 14.</p> <p>Suchter '161 at, e.g., col. 4-5, 8, 14, 17-21; fig. 1A-1B, 4B,</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>6.</p> <p>Suchter '302 at, e.g., col. 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.</p> <p>Swartz '994 at, e.g., col. 4, 6-10, 17-20.</p> <p>Sykes '297 at, e.g., abstract; p. 1; fig. 1; claim 42.</p> <p>Terry '380 at, e.g., col. 10-11, 14, , 17; fig. 1-2; claim 1, 11, 14-15.</p> <p>Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 2, 6-7; claim 1, 13.</p>
<p>2. The system of claim 1, the context component is associated with a workspace, which is a collection of data and application functionality related to the user-defined data.</p>	<p>Belifore '513 at, e.g., col. 15-16, 29; fig.1.</p> <p>Bellotti '409 at, e.g., p. 8.</p> <p>Bensimon '678 at, e.g., p. 1; fig. 1-2.</p> <p>Bly '853 at, e.g., col. 2-3, 15.</p> <p>Brummel '220 at, e.g., col. 2-4; fig. 4.</p> <p>Chasen '721 at, e.g., claim 1.</p> <p>Chronaki at, e.g., p. 260.</p> <p>Dourish '217 at, e.g., fig. 4.</p> <p>Dourish '575 at, e.g., col. 4-8, figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3.</p> <p>Dourish Building Bridges at, e.g., 15-16, 18.</p> <p>Dourish Presto at, e.g., fig. 3; pp. 6, 9-10, 16.</p> <p>Edwards '076 at, e.g., col. 10-11; fig. 1, 4.</p> <p>Edwards '553 at, e.g., col. 11, 13; fig. 1.</p> <p>Estrada '148 at, e.g., col. 8-9; fig. 9.</p> <p>Falkenhainer '801 at, e.g., col. 4; fig. 3.</p> <p>Farnan '365 at, e.g., col. 1; fig. 2.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., fig. 2, 6.</p> <p>Gongwer '118 at, e.g., col. 3-4, 11; fig. 1.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Grambihler '655 at, e.g., abstract; fig. 1.</p> <p>Henderson '534 at, e.g., abstract; p. 3.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 3.1, 3.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 7.</p> <p>Hind '791 at, e.g., col. 3, 7; fig. 2; claims 1, 50.</p> <p>Horvitz '484 at, e.g., pp. 1, 4; fig. 2, 4.</p> <p>Hubert '934 at, e.g., fig. 2(30, 32, 34), col. 2-4, 5, 7-8.</p> <p>Hugh '032 at, e.g., col. 2, 6, 17-18, 21-22.</p> <p>iManage MailSite at, e.g., Chapter 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., figs. 3-4, 7-12, col. 4-5, 8-10 inc. fig. 8 (editing of document with application).</p> <p>Koren '596 at, e.g., col. 2; fig. 2.</p> <p>LaMarca '670 at, e.g., col. 10; fig. 5.</p> <p>LaMarca '682 at, e.g., col. 10; fig. 1.</p> <p>Lamping '538 at, e.g., col. 1, 3.</p> <p>Lamping '551 at, e.g., col. 11-13; fig. 4.</p> <p>MacNaughton '892 at, e.g., col. 7; claims 16, 18.</p> <p>Maritzen '181 at, e.g., p. 4.</p> <p>Nochur '758 at, e.g., col. 5; fig. 2.</p> <p>O'Rourke '813 at, e.g., 3, 7.</p> <p>Oblinger '990 at, e.g., col. 15; fig. 1.</p> <p>Pitroda '990 at, e.g., col. 8-9, 12, 18, 21; fig. 10AA-10AE, 11A, 12, 13A, 14A, 15A, 17A, 19A, 20A, 21A, 22A, 23, 24; claims 3, 19.</p> <p>Pizi '258 at, e.g., col. 2-3; claim 1.</p> <p>Salisbury '231 at, e.g., col. 11; fig. 1.</p> <p>Salisbury '573 at, e.g., col. 10; fig. 1.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2-3.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Seliger '908 at, e.g., col. 2; fig. 1, 4, 7; claim 35.</p> <p>Shea '938 at, e.g., col. 2-3, 9.</p> <p>Suchther '161 at, e.g., fig. 1A-1B, 3A-4A.</p> <p>Suchther '302 at, e.g., fig. 1A-1B, 3A-4A.</p> <p>Swartz '994 at, e.g., col. 20; fig. 5.</p> <p>Sykes '297 at, e.g., fig. 3-12.</p> <p>Terry '380 at, e.g., col. 11, 13; fig. 1; claim 1, 11, 15.</p> <p>Thornton '429 at, e.g., col. 10; fig. 4-5.</p> <p>Zuberec '032 at, e.g., abstract; col. 3.</p>
<p>4. The system of claim 1, the context information includes a relationship between the user and at least one of an application, application data, and user environment.</p>	<p>Belifore '513 at, e.g., col. 15-17, 31-32.</p> <p>Bellotti '409 at, e.g., pp. 4, 8-9, 11.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 10, 19.</p> <p>Brummel '220 at, e.g., col. 3, 7.</p> <p>Chasen '721 at, e.g., col. 1, 3, 10, 13-14; fig. 1.</p> <p>Chronaki at, e.g., pp. 261-62, 264.</p> <p>Dourish '217 at, e.g., col. 7; fig. 4.</p> <p>Dourish '575 at, e.g., col. 4-7, figs. 1-5.</p> <p>Dourish '982 at, e.g., col. 5.</p> <p>Dourish Building Bridges at, e.g., 14-16, 17 (including fig. 3), 18.</p> <p>Dourish Presto at e.g., fig. 2; pp. 4, 16.</p> <p>Edwards '076 at, e.g., fig. 1.</p> <p>Edwards '553 at, e.g., fig. 1.</p> <p>Estrada '148 at, e.g., col. 16; fig. 11; Table 2.</p> <p>Falkenhainer '801 at, e.g., col. 6; fig. 2.</p> <p>Farnan '365 at, e.g., col. 4, 11; fig. 10; Table 1A.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., fig. 8.</p> <p>Gongwer '118 at, e.g., col. 1, 7.</p> <p>Henderson '534 at, e.g., abstract; p. 3.</p> <p>Hess CFS at, e.g., §§ 1, 2, 2.1, 2.2, 2.3, 3.1, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2.</p> <p>Hind '791 at, e.g., col. 3, 7; fig. 7; claims 3-4.</p> <p>Horvitz '484 at, e.g., abstract; pp. 4, 27, 30.</p> <p>Hubert '934 at, e.g., col. 8(table), col. 4-5, 7-8.</p> <p>Hugh '032 at, e.g., fig. 2-3.</p> <p>iManage MailSite at, e.g., Chapters 3, 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 9-10, fig. 4.</p> <p>Koren '596 at, e.g., col. 15; fig. 32.</p> <p>LaMarca '670 at, e.g., col. 10; fig. 3.</p> <p>LaMarca '682 at, e.g., fig. 1.</p> <p>Lamping '551 at, e.g., col. 11-14, fig. 1, 3, 4.</p> <p>MacNaughton '892 at, e.g., col. 8, 17.</p> <p>Maritzen '181 at, e.g., pp. 4-6.</p> <p>Nochur '758 at, e.g., fig. 7.</p> <p>O'Rourke '813 at, e.g., fig. 5.</p> <p>Oblinger '990 at, e.g., abstract; col. 10.</p> <p>Petersen '179 at, e.g., col. 10; fig. 1.</p> <p>Pitroda '990 at, e.g., col. 4, 13.</p> <p>Pizi '258 at, e.g., col. 5-7.</p> <p>Salisbury '231 at, e.g., col. 16; fig. 1.</p> <p>Salisbury '573 at, e.g., fig. 1.</p> <p>Schroeter pp. 318-19.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Seliger '648 at, e.g., col. 2, 8.</p> <p>Seliger '908 at, e.g., col. 2, 8; claim 4.</p> <p>Shea '938 at, e.g., col. 2-3, 8-9.</p> <p>Suchter '161 at, e.g., col. 8, 14.</p> <p>Suchter '302 at, e.g., col. 8, 14.</p> <p>Swartz '994 at, e.g., col. 4, 6, 8.</p> <p>Terry '380 at, e.g., fig. 1.</p> <p>Thornton '429 at, e.g., col. 8, 13-14; fig. 1; claim 10.</p> <p>Zuberec '032 at, e.g., col. 3, 5-7; claim 16, 21.</p>
<p>5. The system of claim 1, the context component captures context information of the first context and context information related to at least one other context.</p>	<p>Belifore '513 at, e.g., col. 15-16.</p> <p>Bellotti '409 at, e.g., p. 5; claims 1-2.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 24, 28-29.</p> <p>Brummel '220 at, e.g., col. 3, 7.</p> <p>Chasen '721 at, e.g., col. 1-2, 11-14.</p> <p>Chronaki at, e.g., pp. 260-61; fig. 7.</p> <p>Dourish '217 at, e.g., col. 7-8; fig. 1, 3.</p> <p>Dourish '575 at, e.g., col. 4-8 (initial filing context); figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 5.</p> <p>Dourish Building Bridges at, e.g., 14-16, fig. 2, 16.</p> <p>Dourish Presto at, e.g., fig. 2; pp. 4, 9-10, 16-19.</p> <p>Edwards '076 at, e.g., col. 9, 13-14; fig. 1, 3.</p> <p>Edwards '553 at, e.g., col. 9-10; fig. 1, 2.</p> <p>Estrada '148 at, e.g., col. 17, 12; Table 2.</p> <p>Falkenhainer '801 at, e.g., col. 5, 13.</p> <p>Farnan '365 at, e.g., col. 5-6.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 3-4; fig. 1.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Gongwer '118 at, e.g., col. 9-10.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., abstract; p. 6.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3-5, 7-8; claims 1, 50.</p> <p>Horvitz '484 at, e.g., pp. 1-2, 30-31; fig. 1, 3-5, 8.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1(16).</p> <p>Hugh '032 at, e.g., col. 5-6, 13; fig. 1-3.</p> <p>iManage MailSite at, e.g., Chapters 3, 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 7-10, fig. 6-11, fig. 12 (showing multiple contexts).</p> <p>Koren '596 at, e.g., col. 15, 21.</p> <p>LaMarca '670 at, e.g., col. 9-10.</p> <p>LaMarca '682 at, e.g., col. 7-8, fig. 1.</p> <p>Lamping '538 at, e.g., col. 6-7.</p> <p>Lamping '551 at, e.g., col. 12-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 8, 17.</p> <p>Maritzen '181 at, e.g., pp. 5-6.</p> <p>Nochur '758 at, e.g., col. 3-4.</p> <p>O'Rourke '813 at, e.g., fig. 5.</p> <p>Oblinger '990 at, e.g., fig. 3, 5.</p> <p>Petersen '179 at, e.g., col. 6-7.</p> <p>Pitroda '990 at, e.g., col. 6, 8, 13.</p> <p>Pizi '258 at, e.g., col. 5-7.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Salisbury '573 at, e.g., col. 8; fig. 1.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 3-4, 6; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 5, 8; fig. 1.</p> <p>Suchter '161 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Suchter '302 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Swartz '994 at, e.g., 4, 6, 19.</p> <p>Terry '380 at, e.g., fig. 1; claims 1, 11, 15.</p> <p>Thornton '429 at, e.g., fig. 3.</p> <p>Zuberec '032 at, e.g., col. 6-7; claim 1, 13.</p>
<p>7. The system of claim 1, wherein data created in the first context is associated with data created in the second context.</p>	<p>Belifore '513 at, e.g., col. 15-16, 43-45.</p> <p>Bellotti '409 at, e.g., p. 5; claims 1-2.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 24, 28-29.</p> <p>Brummel '220 at, e.g., col. 3, 5-6; fig. 4.</p> <p>Chasen '721 at, e.g., col. 1-2, 11-14.</p> <p>Chronaki at, e.g., pp. 260-61.</p> <p>Dourish '217 at, e.g., col. 7-8; fig. 1, 3.</p> <p>Dourish '575 at, e.g., col. 4-8; figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 5.</p> <p>Dourish Building Bridges at, e.g., 14-16, fig. 2.</p> <p>Dourish Presto at, e.g., pp. 4, 9-10, 16-19.</p> <p>Edwards '076 at, e.g., col. 9, 13-14; fig. 1, 3.</p> <p>Edwards '553 at, e.g., col. 9-10; fig. 1, 2.</p> <p>Estrada '148 at, e.g., col. 13, 17, 21; Table 2.</p> <p>Falkenhainer '801 at, e.g., col. 5, 7, 13.</p> <p>Farnan '365 at, e.g., col. 5-6; 30.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Gillings '490 at, e.g., col. 3-4; fig. 1.</p> <p>Gongwer '118 at, e.g., col. 9-11.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., pp. 2, 7.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3-5, 7-8; claims 1, 50.</p> <p>Horvitz '484 at, e.g., pp. 1-2, 30-31; fig. 1, 3-5, 8.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1.</p> <p>Hugh '032 at, e.g., col. 5-6, 13, 27-28; fig. 1-3.</p> <p>iManage MailSite at, e.g., Chapters 3, 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 4-12, figs. 2-12. claim 1.</p> <p>Koren '596 at, e.g., co. 2, 15, 21.</p> <p>LaMarca '670 at, e.g., col. 9-10.</p> <p>LaMarca '682 at, e.g., col. 7-8, fig. 1.</p> <p>Lamping '538 at, e.g., col. 7.</p> <p>Lamping '551 at, e.g., col. 11-16, fig. 2-5.</p> <p>MacNaughton '892 at, e.g., col. 8, 17.</p> <p>Maritzen '181 at, e.g., pp. 1, 5-6; claims 10-11, 20.</p> <p>Nochur '758 at, e.g., col. 3-4.</p> <p>O'Rourke '813 at, e.g., 2, 4-8; fig. 3, 5; claims 1, 23.</p> <p>Oblinger '990 at, e.g., col. 6; fig. 3, 5; claim 1.</p> <p>Pitroda '990 at, e.g., col. 6, 8, 13, 21-22.</p> <p>Pizi '258 at, e.g., col. 5-7.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1.</p> <p>Salisbury '573 at, e.g., col. 8; fig. 1.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 3-4, 6; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 5, 8; fig. 1.</p> <p>Suchter '161 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Suchter '302 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Swartz '994 at, e.g., col. 4, 6, 19-20.</p> <p>Terry '380 at, e.g., fig. 1; claims 1, 11, 15.</p> <p>Thornton '429 at, e.g., col. 11; fig. 3.</p> <p>Zuberec '032 at, e.g., col. 2, 5-7.</p>
<p>8. The system of claim 1, the context information is tagged to the user-defined data via the metadata when the user-defined data is created.</p>	<p>Belifore '513 at, e.g., col. 3-4, 10-15, 29-32, 43-45.</p> <p>Bellotti '409 at, e.g., pp. 4-5, 11; claims 6-8.</p> <p>Bensimmon '678 at, e.g., abstract; p. 1, 3, 6; fig. 1-4.</p> <p>Bly '853 at, e.g., abstract; col. 8, 10, 17, 19, 24, 28-29; fig. 2.</p> <p>Brummel '220 at, e.g., col. 3, 5-6, 9; fig. 4; claim 1.</p> <p>Chasen '721 at, e.g., abstract; col. 1-2, 11-14; fig. 2.</p> <p>Chronaki at, e.g., pp. 260-64; fig. 6-7.</p> <p>Dourish '217 at, e.g., col. 7, 10; fig. 1, 4.</p> <p>Dourish '575 at, e.g., col. 4-8 (discussion of initial filing context); figs. 1-7.</p> <p>Dourish '982 at e.g., col. 3, 6-7.</p> <p>Dourish Building Bridges at, e.g., 14-16, fig. 2, 17-18 (categories, including fig. 3).</p> <p>Dourish Presto at, e.g., §§ 6.1. pp. 15-19, 7-11, 4; fig. 2, 3.</p> <p>Edwards '076 at, e.g., col. 11, 13.</p> <p>Edwards '553 at, e.g., col. 7, 9-11; fig. 1.</p> <p>Estrada '148 at, e.g., col. 8, 13, 21; fig. 10, 14-15; Table 2.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 1-2, 7; fig. 3.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Farnan '365 at, e.g., abstract; col. 1-4, 30.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 3-4; fig. 1.</p> <p>Gongwer '118 at, e.g., col. 3-4, 6-11; claims 1, 8.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., pp. 2, 7.</p> <p>Hess CFS at, e.g., §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 10.</p> <p>Horvitz '484 at, e.g., pp. 1-2, 6, 30-31; fig. 5.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1.</p> <p>Hugh '032 at, e.g., col. 5-6, 13; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3, 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 4-6, 9-12, figs. 4(404), 6-8, 12.</p> <p>Koren '596 at, e.g., co. 2, 15, 21.</p> <p>LaMarca '670 at, e.g., col. 9-10.</p> <p>LaMarca '682 at, e.g., col. 7, 14, fig. 1.</p> <p>Lamping '551 at, e.g., abstract; col. 2, 11-16; fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 7-8, 17; claim 12.</p> <p>Maritzen '181 at, e.g., abstract; pp. 3-4, 6; fig. 9; claims 9-11, 20.</p> <p>Nochur '758 at, e.g., col. 5-7, 10; fig. 2, 7.</p> <p>O'Rourke '813 at, e.g., 6, 8-9; claim 1, 19.</p> <p>Oblinger '990 at, e.g., abstract; col. 5-6, 9-10; fig. 1-3, 5; claim 1-2, 10.</p> <p>Petersen '179 at, e.g., col. 10, 17.</p> <p>Pitroda '990 at, e.g., col. 19.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pizi '258 at, e.g., col. 4-5, 7; claim 1, 5.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-11, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2.</p> <p>Seliger '908 at, e.g., abstract; col. 2-4; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 6.</p> <p>Suchter '161 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Suchter '302 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Swartz '994 at, e.g., col. 6, 8; fig. 14.</p> <p>Terry '380 at, e.g., fig. 1; claims 1, 11, 15.</p> <p>Thornton '429 at, e.g., col. 11; fig. 3.</p> <p>Zuberec '032 at, e.g., abstract; col. 2, 6-7; claims 1, 13.</p>
<p>9. A computer-implemented method of managing data, comprising computer-executable acts of:</p>	<p>Belifore '513 at, e.g., col. 2-3; fig. 1.</p> <p>Bellotti '409 at, e.g., abstract; p. 3; fig. 19; claim 1.</p> <p>Bensimmon '678 at, e.g., pp. 1, 3; claim 1.</p> <p>Bly '853 at, e.g., abstract; col. 1; claim 1.</p> <p>Brummel '220 at, e.g., col. 2-9; claim 1.</p> <p>Chasen '721 at, e.g., abstract; col. 6; claim 1.</p> <p>Chronaki at, e.g., abstract.</p> <p>Dourish '217 at, e.g., abstract; claim 1.</p> <p>Dourish '575 at, e.g., Abstract, Fig. 1, col. 2-3 (summary), 3-4 (detailed description), <i>passim</i>.</p> <p>Dourish '982 at, e.g., abstract; claim 1.</p> <p>Dourish Building Bridges at, e.g., Abstract, 14-19.</p> <p>Dourish Presto at, e.g., p. 1.</p> <p>Edwards '076 at, e.g., abstract; claim 1.</p> <p>Edwards '553 at, e.g., abstract; claim 1.</p> <p>Estrada '148 at, e.g., abstract; claim 6, 10, 21.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Falkenhainer '801 at, e.g., abstract; col. 1-2; claim 1.</p> <p>Farnan '365 at, e.g., abstract; col. 1-4.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., abstract; col. 4; claim 1.</p> <p>Gongwer '118 at, e.g., col. 1, 3.</p> <p>Grambihler '655 at, e.g., abstract; col. 2-4; fig. 1.</p> <p>Henderson '534 at, e.g., abstract; pp. 1, 3-4; fig. 7; claim 1.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 5, <i>passim</i>.</p> <p>Hess Manual at, e.g., §§ 1, <i>passim</i>.</p> <p>Hess Thesis at, e.g., §§ 1.1, 1.2, 1.4, 2.1, 3.1, <i>passim</i>.</p> <p>Hind '791 at, e.g., abstract; col. 1, 3; fig. 2.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-3; fig. 1.</p> <p>Hubert '934 at, e.g., Abstract, col. 1-4.</p> <p>Hugh '032 at, e.g., abstract; col. 2, 26-27.</p> <p>iManage MailSite at, e.g., Chapter 2.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., Abstract, col. 2-3 (summary), 4-6.</p> <p>Koren '596 at, e.g., abstract; col. 5; fig. 1, 2, 5A, 14.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2; claim 1.</p> <p>LaMarca '682 at, e.g., abstract; claim 1.</p> <p>Lamping '538 at, e.g., col. 1.</p> <p>Lamping '551 at, e.g., Abstract, col. 7-8, 10-12, <i>passim</i>; claim 1.</p> <p>MacNaughton '892 at, e.g., abstract; claim 1.</p> <p>Maritzen '181 at, e.g., abstract.</p> <p>Nochur '758 at, e.g., col. 3-4, 9; claim 1.</p> <p>O'Rourke '813 at, e.g., abstract, col. 5; claims 1, 3, 5, 8, 10, 16, 20, 23, 30-32, 38-39.</p> <p>Oblinger '990 at, e.g., abstract; claim 1.</p> <p>Petersen '179 at, e.g., col. 1-2, 6.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pitroda '990 at, e.g., col. 1, 3.</p> <p>Pizi '258 at, e.g., abstract; col. 6.</p> <p>Salisbury '231 at, e.g., abstract; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; claim 8.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 1-2, 9; fig. 7.</p> <p>Seliger '908 at, e.g., abstract; col. 3-4; claim 1.</p> <p>Shea '938 at, e.g., abstract.</p> <p>Suchter '161 at, e.g., abstract; fig. 1A-1B, 6; claim 1.</p> <p>Suchter '302 at, e.g., abstract; fig. 1A-1B, 6; claim 1.</p> <p>Swartz '994 at, e.g., col. 1, 3-4.</p> <p>Sykes '297 at, e.g., abstract; claim 1.</p> <p>Terry '380 at, e.g., abstract.</p> <p>Thornton '429 at, e.g., abstract; claim 1.</p> <p>Zuberec '032 at, e.g., abstract; col. 7; claim 1.</p>
<p>creating data within a user environment of a web-based computing platform via user interaction with the user environment by a user using an application, the data in the form of at least files and documents; dynamically associating metadata with the data, the data and metadata stored on a storage component of the web-based computing platform, the metadata includes information related to the user, the data, the application, and the user environment; tracking movement of the user from the user environment of the web-based computing platform to a second user environment of the web-based computing platform; and dynamically updating the stored</p>	<p>Belifore '513 at, e.g., col. 2-4, 10-17, 20-21, 28-32; fig. 1, 5.</p> <p>Bellotti '409 at, e.g., pp. 2-5, 11; claims 1-3, 6-8.</p> <p>Bensimmon '678 at, e.g., abstract; pp. 1, 3, 6; fig. 1-4.</p> <p>Bly '853 at, e.g., abstract; col. 1, 8-10, 17-19, 24, 28-29; fig. 2.</p> <p>Brummel '220 at, e.g., col. 2-9; claim 1, 3, 8.</p> <p>Chasen '721 at, e.g., abstract; col. 1-5, 10-16; fig. 2; claim 1.</p> <p>Chronaki at, e.g., abstract; pp. 259-65; fig. 6-7.</p> <p>Dourish '217 at, e.g., col. 7, 10, 16; fig. 4.</p> <p>Dourish '575 at, e.g., col. 3-9, figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3, 6-7.</p> <p>Dourish Building Bridges at, e.g., 15-16, 18.</p> <p>Dourish Presto at, e.g., fig. 1; pp. 1-2, 4, 5-8, 11, 15-19.</p> <p>Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.</p> <p>Edwards '553 at, e.g., abstract; col. 7, 9-11, 14; fig. 1-2, 4,</p>

Claim Language of '761 Patent	Invalidating Prior Art
<p>metadata with an association of the data, the application, and the second user environment wherein the user employs at least one of the application and the data from the second environment.</p>	<p>9a-9b.</p> <p>Estrada '148 at, e.g., abstract; col. 5-6, 8, 12, 17, 21, 27-28; fig. 1-3, 5-6, 9-10, 12-15, 22; Table 1-2; claim 1, 4, 6, 10.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 3-7, 11-12; fig. 1.</p> <p>Farnan '365 at, e.g., abstract; col. 1-4, 11-13, 26; fig. 4-10; Table 1A, 1C; claim 1, 2, 4, 37.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10.</p> <p>Gongwer '118 at, e.g., col. 3-4, 6-10; claims 1, 8, 14-15, 17.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., abstract; pp. 1-4, 6-8; fig. 5, 7, 9; claims 1, 5, 7.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1 (inc. fig. 1), 2.2, 3, 3.1, 3.3, 4.1, 4.2, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 3.1, 3.2, 3.4, 3.4.1, 4.5, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 5.5.</p> <p>Hind '791 at, e.g., col. 3, 5-8, 12; fig. 1-2; claim 1, 7.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-2, 5-7, 9, 14, 27-28, 30-31; fig. 1-5.</p> <p>Hubert '934 at, e.g., col. 2-4, Fig. 1-2, col. 5-8.</p> <p>Hugh '032 at, e.g., col. 3, 5-6, 13, 20-22, 24, 27-28; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3-5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 2-3 (summary), 4-12 (description), figs. 2-12. claim 1.</p> <p>Koren '596 at, e.g., col. 1-2, 5, 10, 14-15, 21-23; fig. 2, 5A, 24A, 32.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2, 10-11; fig. 3, 5.</p> <p>LaMarca '682 at, e.g., abstract; col. 7-8, 10-12; fig. 1; claim 1.</p> <p>Lamping '538 at, e.g., col. 1-4, 6-8.</p> <p>Lamping '551 at, e.g., abstract; cols. 2, 9-16, figs. 1-5.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>MacNaughton '892 at, e.g., abstract; col. 1-3, 6-8, 16-19; fig. 1A-1B, 3-4; claim 1, 12.</p> <p>Maritzen '181 at, e.g., abstract; pp. 3-6; fig. 7, 9; claims 9-13, 20.</p> <p>Nochur '758 at, e.g., col. 5-7, 10, 13-14; fig. 2, 7.</p> <p>O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.</p> <p>Oblinger '990 at, e.g., abstract; col. 5-10; fig. 1-3, 5; claims 15-17, 21.</p> <p>Petersen '179 at, e.g., col. 1-3, 6-8, 10, 13, 15, 17, 26; fig. 1.</p> <p>Pitroda '990 at, e.g., col. 5-8, 13, 18-19, 21, 23, 52; fig. 6, 10, 10AA-10AE, 11A, 12, 13A, 14A, 15A, 17A, 19A, 20A, 21A, 22A, 23, 24.</p> <p>Pizi '258 at, e.g., col. 2, 4-7; claim 1, 5.</p> <p>Salisbury '231 at, e.g., col. 10-11, 16; fig. 1-2; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-12, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '313 at, e.g., col. 1, 3, 9.</p> <p>Seliger '648 at, e.g., col. 2-4, 7-9, 12, 14-15; fig. 16.</p> <p>Seliger '908 at, e.g., abstract; col. 2-5, 7-9; fig. 1, 4, 14-16; claim 1.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 6, 8; fig. 1; claim 1, 4, 6, 12, 14.</p> <p>Suchter '161 at, e.g., col. 1, 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.</p> <p>Suchter '302 at, e.g., col. 1, 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.</p> <p>Swartz '994 at, e.g., col. 6, 8-10, 18-20; fig. 3.</p> <p>Sykes '297 at, e.g., abstract; p. 1; fig. 1, 3-13.</p> <p>Terry '380 at, e.g., col. 10-12, 14, , 17; fig. 1; claim 1, 11, 14-15.</p> <p>Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1, 4; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 2-3, 6-7; claims 1, 13.</p>

Claim Language of '761 Patent	Invalidating Prior Art
<p>10. The method of claim 9, further comprising capturing context information of the user.</p>	<p>Belifore '513 at, e.g., col. 15-17, 31-32.  Bellotti '409 at, e.g., pp. 4, 8-9, 11.  Bensimmon '678 at, e.g., p. 1.  Bly '853 at, e.g., col. 10, 19.  Brummel '220 at, e.g., col. 3, 7.  Chronaki at, e.g., p. 262, 264.  Dourish '217 at, e.g., col. 7; fig. 4.  Dourish '575 at, e.g., col. 4-6, fig. 2 (e.g., 204), fig. 3-5 (examples).  Dourish '982 at, e.g., col. 5.  Dourish Building Bridges at, e.g., 14-16; fig. 2, 18.  Dourish Presto at, e.g., fig. 2; p. 4.  Edwards '076 at, e.g., fig. 1.  Edwards '553 at, e.g., fig. 1.  Estrada '148 at, e.g., col. 16; fig. 11; Table 2.  Falkenhainer '801 at, e.g., col. 6; fig. 2.  Farnan '365 at, e.g., fig. 10; Table 1A.  Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.  Gillings '490 at, e.g., fig. 8.  Gongwer '118 at, e.g., col. 1, 3-4, 6-10; claims 1, 8.  Grambihler '655 at, e.g., abstract; col. 4-6.  Henderson '534 at, e.g., abstract.  Hess CFS at, e.g., §§ 1, 2, 2.1, 2.2, 2.3, 3.1, 4:3, 5, 6.  Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.  Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.  Hind '791 at, e.g., col. 1, 7; claims 3-4.  Horvitz '484 at, e.g., pp. 4-5, 27, 30.  Hubert '934 at, e.g., col. 8(table), col. 4-5, 7-8.  Hugh '032 at, e.g., fig. 2-3.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>iManage MailSite at, e.g., Chapters 3, 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., fig. 4, col. 4-7.</p> <p>Koren '596 at, e.g., col. 15; fig. 32.</p> <p>LaMarca '670 at, e.g., col. 1, 10; fig. 3.</p> <p>LaMarca '682 at, e.g., fig. 1.</p> <p>Lamping '551 at, e.g., col. 10-11, 13-14, Fig. 1, 3, 4.</p> <p>MacNaughton '892 at, e.g., col. 8, 17.</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Nochur '758 at, e.g., fig. 7.</p> <p>O'Rourke '813 at, e.g., fig. 5.</p> <p>Oblinger '990 at, e.g., abstract; col. 10.</p> <p>Petersen '179 at, e.g., col. 19.</p> <p>Pitroda '990 at, e.g., col. 6, 8.</p> <p>Pizi '258 at, e.g., col. 5, 7.</p> <p>Salisbury '231 at, e.g., col. 16; fig. 1.</p> <p>Salisbury '573 at, e.g., fig. 1.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8.</p> <p>Seliger '908 at, e.g., col. 2, 8.</p> <p>Shea '938 at, e.g., abstract; col. 8; fig. 4-5.</p> <p>Suchter '161 at, e.g., col. 8, 14.</p> <p>Suchter '302 at, e.g., col. 8, 14.</p> <p>Swartz '994 at, e.g., col.6; claims 5, 6.</p> <p>Terry '380 at, e.g., fig. 1.</p> <p>Thornton '429 at, e.g., fig. 1.</p> <p>Zuberec '032 at, e.g., claims 16, 21.</p>
<p>11. The method of claim 9, further comprising indexing content of the</p>	<p>Belifore '513 at, e.g., col. 16-19, 29, 31-32, 43-45.</p>

Claim Language of '761 Patent	Invalidating Prior Art
user environment such that a plurality of users can access the content from an associated plurality of user environments.	<p>Bellotti '409 at, e.g., p. 11.</p> <p>Bensimmon '678 at, e.g., fig. 1-2; p. 1.</p> <p>Bly '853 at, e.g., abstract; col. 1, 8, 28; claim 1.</p> <p>Brummel '220 at, e.g., col. 2, 6; fig. 4.</p> <p>Chasen '721 at, e.g., col. 6.</p> <p>Chronaki at, e.g., p. 260.</p> <p>Dourish '217 at, e.g., col. 9-10.</p> <p>Dourish '575 at, e.g., col. 4-8, figs. 1-7 (all discussing filing structures); claim 1(a)-(b), <i>passim</i>.</p> <p>Dourish '982 at, e.g., col. 5.</p> <p>Dourish Building Bridges at, e.g., 14-18, figs. 2-3.</p> <p>Dourish Presto at, e.g., fig. 2; pp. 4-6, 8.</p> <p>Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.</p> <p>Edwards '553 at, e.g., col. 9.</p> <p>Estrada '148 at, e.g., col. 5, 16-17.</p> <p>Falkenhainer '801 at, e.g., col. 3, 5; fig. 1.</p> <p>Farnan '365 at, e.g., col. 10; fig. 2, 10, 12; claim 13.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 3-4; fig. 1.</p> <p>Gongwer '118 at, e.g., col. 1; claims 1, 4, 7, 17.</p> <p>Grambihler '655 at, e.g., abstract; fig. 1.</p> <p>Henderson '534 at, e.g., abstract; pp. 2, 4-5, 7.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.1, 4.2, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3, 5, 7; fig. 1; claims 1-2, 4.</p> <p>Horvitz '484 at, e.g., pp. 4, 30; fig. 3.</p> <p>Hubert '934 at, e.g., fig. 2 (30, 32, 34); col. 2-3, 4-5, 7-8.</p> <p>Hugh '032 at, e.g., col. 26-28.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>iManage System, e.g., see disclosures for iManage MailSite.  Johnson at, e.g., p. 187.  Jones '731 at, e.g., col. 6-8, 11-12, fig. 6-10, 12.  Koren '596 at, e.g., col. 2, 9-11.  LaMarca '670 at, e.g., col. 10; fig. 5.  LaMarca '682 at, e.g., col. 9, 11.  Lamping '538 at, e.g., col. 4.  Lamping '551 at, e.g., cols. 9-16, figs. 2-5.  MacNaughton '892 at, e.g., col. 1-2, 5-6; 8; claim 6, 9.  Maritzen '181 at, e.g., pp. 4-6.  Nochur '758 at, e.g., col. 13-14; fig. 2.  O'Rourke '813 at, e.g., fig. 5.  Oblinger '990 at, e.g., abstract; col. 11-12; fig. 2.  Petersen '179 at, e.g., col. 7, 13; claims 4, 9.  Pitroda '990 at, e.g., col. 13.  Pizi '258 at, e.g., col. 2-3, 5-6; claim 1.  Salisbury '231 at, e.g., col. 12.  Salisbury '573 at, e.g., col. 11.  Schroeter pp. 318-19.  Seliger '648 at, e.g., col. 1-3, 8-9.  Seliger '908 at, e.g., col. 5-6; fig. 1, 4; claim 1, 9, 11.  Shea '938 at, e.g., abstract; col. 6; fig. 1.  Suchter '161 at, e.g., col. 5-6.  Suchter '302 at, e.g., col. 5-6.  Swartz '994 at, e.g., col. 4, 8-9, 20.  Terry '380 at, e.g., col. 8, 12; claim 5.  Thornton '429 at, e.g., col. 8, 10, 13.  Zuberec '032 at, e.g., abstract; col. 3; fig. 2; claim 19.</p>
12. The method of claim 9, the least one of the data and the	Belifore '513 at, e.g., col. 10-17, 20-21, 29-31; fig. 5.

Claim Language of '761 Patent	Invalidating Prior Art
<p>application is associated automatically with the second user environment.</p>	<p>Bellotti '409 at, e.g., pp. 4-5, 11; claims 6-8.  Bensimmon '678 at, e.g., pp. 1, 6.  Bly '853 at, e.g., col. 1, 8-10, 17-19, 24.  Brummel '220 at, e.g., col. 3, 6, 9-10; claims 3, 8.  Chasen '721 at, e.g., abstract; col. 1-5, 14-16; fig. 2.  Chronaki at, e.g., p. 260-65; fig. 7.  Dourish '217 at, e.g., col. 16.  Dourish '575 at, e.g., col. 4-8, figs. 1-7 (translation of filing structures/contexts).  Dourish '982 at, e.g., col. 3, 6-7.  Dourish Building Bridges at, e.g., 14-18, fig. 2-3.  Dourish Presto at, e.g., fig. 2; pp. 4-8, 11.  Edwards '076 at, e.g., col. 14-16.  Edwards '553 at, e.g., col. 7, 9.  Estrada '148 at, e.g., col. 8, 21; fig. 10, 14-15; Table 2.  Falkenhainer '801 at, e.g., col. 4-6, 11-12.  Farman '365 at, e.g., col. 5-6; claim 1, 37.  Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.  Gillings '490 at, e.g., 2-4, 7.  Gongwer '118 at, e.g., col. 7, 9, 10; claims 1, 8, 14-15, 17.  Grambihler '655 at, e.g., col. 5-8.  Henderson '534 at, e.g., pp. 1, 3, 6-8; claims 1, 5.  Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.1, 4.2, 4.3, 5, 6.  Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.  Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.  Hind '791 at, e.g., col. 8.  Horvitz '484 at, e.g., pp. 1-2, 30-31; fig. 1, 3-5, 8.  Hubert '934 at, e.g., fig. 2 (30, 32, 34); col. 2-3, 4-5, 7-8.  Hugh '032 at, e.g., col. 20, 24, 27-28.  iManage MailSite at, e.g., Chapters 3 &amp; 5.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 7-9, fig. 6-10, 12.</p> <p>Koren '596 at, e.g., col. 2, 10, 14-15, 21; fig. 35-36.</p> <p>LaMarca '670 at, e.g., col. 10-11.</p> <p>LaMarca '682 at, e.g., col. 7, 14.</p> <p>Lamping '538 at, e.g., col. 2, 7.</p> <p>Lamping '551 at, e.g., cols. 9-16, fig. 5.</p> <p>MacNaughton '892 at, e.g., col. 6-8, 16-19; fig. 1A-1B, 3-4.</p> <p>Maritzen '181 at, e.g., abstract; pp. 3-4, 6; fig. 7-9; claim 12.</p> <p>Nochur '758 at, e.g., col. 6, 10, 13-14.</p> <p>O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.</p> <p>Oblinger '990 at, e.g., abstract; col. 6-9; fig. 1-2; claim 15-17, 21.</p> <p>Pitroda '990 at, e.g., col. 6, 8, 13, 21-22.</p> <p>Pizi '258 at, e.g., col. 2, 4-5, 7; claim 1.</p> <p>Salisbury '231 at, e.g., col. 10; claim 12.</p> <p>Salisbury '573 at, e.g., col. 8, 10.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 2-5, 8-9; fig. 1, 4, 14-16; claim 1.</p> <p>Shea '938 at, e.g., abstract.</p> <p>Suchter '161 at, e.g., col. 5, 19-20; fig. 4B.</p> <p>Suchter '302 at, e.g., col. 5, 19-20; fig. 4B.</p> <p>Swartz '994 at, e.g., col. 19-20.</p> <p>Terry '380 at, e.g., abstract; col. 9-10, 17.</p> <p>Thornton '429 at, e.g., col. col. 14-15; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 6-7; claims 1, 13.</p>
13. The method of claim 9, further comprising accessing the user environment and the second user	Belifore '513 at, e.g., col. 2, 4, 20, 28; fig. 1.

Claim Language of '761 Patent	Invalidating Prior Art
environment using a browser.	<p>Bellotti '409 at, e.g., p. 2.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 15.</p> <p>Brummel '220 at, e.g., col. 4.</p> <p>Chasen '721 at, e.g., col. 10, 17.</p> <p>Chronaki at, e.g., pp. 259, 263.</p> <p>December at e.g., pp. 330-335.</p> <p>Dourish '217 at, e.g., col. 11.</p> <p>Dourish '575 at, e.g., col. 3, 5, 6, claim 12.</p> <p>Dourish '982 at, e.g., col. 6.</p> <p>Dourish Building Bridges at, e.g., fig. 3, p. 16 ("web-based prototype").</p> <p>Dourish Presto at, e.g., fig. 3; pp. 15-19.</p> <p>Edwards '076 at, e.g., col. 12.</p> <p>Edwards '553 at, e.g., col. 9, 14.</p> <p>Estrada '148 at, e.g., col. 5-6; fig. 2-3, 5-6, 9, 13-14, 16, 33, 35.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 3.</p> <p>Faman '365 at, e.g., col. 4, 14; Table 1A.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gongwer '118 at, e.g., col. 9.</p> <p>Grambihler '655 at, e.g., col. 3-4.</p> <p>Henderson '534 at, e.g., p. 1.</p> <p>Hess CFS at, e.g., § 5 (inc. Fig. 4).</p> <p>Hess Thesis at, e.g., §§ 4.1, 7, 7.1, 7.4.</p> <p>Hind '791 at, e.g., col. 3, 5; fig. 1-2.</p> <p>Horvitz '484 at, e.g., pp. 3, 5-6; fig. 1.</p> <p>Hubert '934 at, e.g., col 7(table showing URL, reference to Web Server).</p> <p>Hugh '032 at, e.g., col. 3, 26, 31.</p> <p>iManage MailSite at, e.g., 33-34 (inc. fig. 2.1).</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Jones '731 at, e.g., col. 6, 7 (http), 11-12 (the Web), 13, passim. One of ordinary skill in the art would appreciate that references to http, the Web and accessing documents through URLs inherently disclose the existence of a web browser.</p> <p>Koren '596 at, e.g., col. 6; fig. 21-22.</p> <p>LaMarca '670 at, e.g., fig. 5.</p> <p>LaMarca '682 at, e.g., 12.</p> <p>Lamping '538 at, e.g., col. 4, 6.</p> <p>Lamping '551 at, e.g., col. 8, 11, 13; fig. 3(12a).</p> <p>MacNaughton '892 at, e.g., abstract; col. 5; fig. 1A, 6; claims 1-3, 12.</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Microsoft Dictionary at, e.g., p. 505 (definition of web browser).</p> <p>Oblinger '990 at, e.g., col. 6.</p> <p>Petersen '179 at, e.g., col. 8, 25; fig. 7.</p> <p>Pitroda '990 at, e.g., col. 7, 23, 52.</p> <p>Pizi '258 at, e.g., col. 6.</p> <p>Salisbury '231 at, e.g., col. 16.</p> <p>Salisbury '573 at, e.g., col. 12.</p> <p>Seliger '648 at, e.g., col. 14-15; fig. 16.</p> <p>Seliger '908 at, e.g., col. 12-13.</p> <p>Suchter '161 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p> <p>Suchter '302 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p> <p>Swartz '994 at, e.g., col. 20; fig. 15-17.</p> <p>Sykes '297 at, e.g., abstract; fig. 3-12.</p> <p>Terry '380 at, e.g., col. 12.</p> <p>Thornton '429 at, e.g., fig. 4.</p> <p>Zuberec '032 at, e.g., col. 3.</p>
<p>14. The method of claim 9, further comprising communicating with the user environment using a</p>	<p><i>See disclosures for claim 13, above, which are incorporated herein by reference.</i></p>

Claim Language of '761 Patent	Invalidating Prior Art
TCP/IP communication protocol.	<p>Belifore '513 at, e.g., col. 2, 4, 20, 28; fig. 1.</p> <p>Bellotti '409 at, e.g., p. 2.</p> <p>Bensimmon '678 at, e.g., pp. 1, 5-6.</p> <p>Bly '853 at, e.g., col. 15.</p> <p>Brummel '220 at, e.g., col. 4.</p> <p>Chasen '721 at, e.g., col. 10, 17.</p> <p>Chronaki at, e.g., pp. 263-64.</p> <p>December at e.g., pp. 330-335.</p> <p>Dourish '217 at, e.g., col. 11.</p> <p>Dourish '575 at, col. 3, 5, 6, claim 12 (web-based system), col. 7 (Internet). One of ordinary skill in the art would understand that web-based and Internet systems as disclosed in this reference inherently disclose communicating using the TCP/IP communication protocol.</p> <p>Dourish '982 at, e.g., col. 6.</p> <p>Dourish Building Bridges at, e.g., passim, p. 16 ("web-based prototype"). One of ordinary skill in the art would understand that web-based systems as disclosed in this reference inherently disclose communicating using the TCP/IP communication protocol.</p> <p>Dourish Presto at, e.g., fig. 1; pp. 7, 15.</p> <p>Edwards '076 at, e.g., col. 12.</p> <p>Edwards '553 at, e.g., col. 9, 14.</p> <p>Estrada '148 at, e.g., col. 10; fig. 3.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 3, 13; fig. 1.</p> <p>Farnan '365 at, e.g., col. 4, 14; Table 1A.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gongwer '118 at, e.g., col. 9.</p> <p>Grambihler '655 at, e.g., col. 3-4.</p> <p>Henderson '534 at, e.g., p. 1.</p> <p>Hess CFS at, e.g., § 5.</p> <p>Hind '791 at, e.g., col. 3, 5; fig. 1-2.</p> <p>Horvitz '484 at, e.g., pp. 3, 5-6; fig. 1.</p> <p>Hubert '934 at, e.g., col 7(table showing URL, reference to</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Web Server). One of ordinary skill in the art would understand that web-based systems as disclosed in this reference inherently disclose communicating using the TCP/IP communication protocol.</p> <p>Hugh '032 at, e.g., col. 3, 26, 31.</p> <p>iManage MailSite at, e.g., 15, 33-34 (inc. fig. 2.1).</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Jones '731 at, e.g., col. 6, 7 (http), 11-12 (the Web), 13, passim. One of ordinary skill in the art would appreciate that references to http, the Web and accessing documents through URLs inherently disclose communicating using the TCP/IP communication protocol.</p> <p>Koren '596 at, e.g., col. 6.</p> <p>LaMarca '670 at, e.g., fig. 5.</p> <p>LaMarca '682 at, e.g., col. 12.</p> <p>Lamping '551 at, e.g., col. 3, 11. One of ordinary skill in the art would appreciate that references to the Web inherently discloses communicating using the TCP/IP communication protocol.</p> <p>Lamping '551 at, e.g., col. 13.</p> <p>MacNaughton '892 at, e.g., abstract; col. 5; fig. 1A, 6; claims 1-3, 12.</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Microsoft Dictionary at, e.g., p. 462 (definition of TCP/IP), p. 505 (definition of web browser).</p> <p>Oblinger '990 at, e.g., col. 6.</p> <p>Petersen '179 at, e.g., col. 1-2.</p> <p>Pitroda '990 at, e.g., cols. 7, 23, 52.</p> <p>Pizi '258 at, e.g., col. 6.</p> <p>Salisbury '231 at, e.g., col. 16.</p> <p>Salisbury '573 at, e.g., col. 12.</p> <p>Seliger '648 at, e.g., col. 4, 14-15; fig. 16.</p> <p>Seliger '908 at, e.g., col. 12-13.</p> <p>Suchter '161 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Suchter '302 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p> <p>Swartz '994 at, e.g., col. 9; fig. 3.</p> <p>Sykes '297 at, e.g., abstract; fig. 3-12.</p> <p>Terry '380 at, e.g., col. 12.</p> <p>Thornton '429 at, e.g., fig. 4.</p> <p>Zuberec '032 at, e.g., col. 3.</p>
<p>15. The method of claim 9, further comprising locating the user environment from a remote location using a URL address.</p>	<p><i>See disclosures for claims 13 and 14, above, which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 2, 4, 20, 28; fig. 1.</p> <p>Bellotti '409 at, e.g., p. 2.</p> <p>Bensimmon '678 at, e.g., pp. 5-6.</p> <p>Bly '853 at, e.g., col. 15.</p> <p>Brummel '220 at, e.g., col. 4.</p> <p>Chasen '721 at, e.g., col. 10, 17.</p> <p>Chronaki at, e.g., pp. 259-60; fig. 6.</p> <p>December at e.g., pp. 330-335.</p> <p>Dourish '217 at, e.g., col. 11.</p> <p>Dourish '575 at, e.g., col. 3, 5-7 (URLs), claim 11.</p> <p>Dourish '982 at, e.g., col. 6.</p> <p>Dourish Building Bridges at, e.g., passim, p. 16 ("web-based prototype"). One of ordinary skill in the art would understand that web-based systems inherently locate a desired resource using a URL address.</p> <p>Dourish Presto at, e.g., fig. 1; pp. 7, 15.</p> <p>Edwards '076 at, e.g., col. 12.</p> <p>Edwards '553 at, e.g., col. 9, 14.</p> <p>Estrada '148 at, e.g., col. 8; fig. 14, 25.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 3, 13; fig. 1.</p> <p>Farnan '365 at, e.g., col. 4, 14; Table 1A.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Gongwer '118 at, e.g., col. 9.</p> <p>Grambihler '655 at, e.g., col. 3-4.</p> <p>Henderson '534 at, e.g., p. 1.</p> <p>Hess CFS at, e.g., § 5.</p> <p>Hind '791 at, e.g., col. 3, 5; fig. 1-2.</p> <p>Horvitz '484 at, e.g., pp. 3, 5-6; fig. 1.</p> <p>Hubert '934 at, e.g., col 7(table showing URL, reference to Web Server).</p> <p>Hugh '032 at, e.g., col. 3, 26, 31.</p> <p>iManage MailSite at, e.g., 15, 33-34 (inc. fig. 2.1), 47, 58, 118.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Jones '731 at, e.g., fig. 4, col. 6, claim 19, passim (URLs).</p> <p>Koren '596 at, e.g., col. 6, 11.</p> <p>LaMarca '670 at, e.g., fig. 5.</p> <p>LaMarca '682 at, e.g., col. 12.</p> <p>Lamping '551 at, e.g., col. 3, 11. One of ordinary skill in the art would understand that web-based systems inherently locate a desired resource using a URL address.</p> <p>Lamping '551 at, e.g., col. 13.</p> <p>MacNaughton '892 at, e.g., abstract; col. 5; fig. 1A, 6; claims 1-3, 12.</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Microsoft Dictionary at, e.g., p. 462 (definition of TCP/IP), p. 487 (definition of URL), p. 505 (definition of web browser).</p> <p>Oblinger '990 at, e.g., col. 6.</p> <p>Petersen '179 at, e.g., col. 1-2.</p> <p>Pitroda '990 at, e.g., col. 7, 23, 52.</p> <p>Pizi '258 at, e.g., col. 6.</p> <p>Salisbury '231 at, e.g., col. 16.</p> <p>Salisbury '573 at, e.g., col. 12.</p> <p>Seliger '648 at, e.g., col. 13-15; fig. 16.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Seliger '908 at, e.g., col. 4, 12-13; claim 1.</p> <p>Suchter '161 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p> <p>Suchter '302 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.</p> <p>Swartz '994 at, e.g., col. 20; fig. 15-17.</p> <p>Sykes '297 at, e.g., abstract; fig. 3-12.</p> <p>Terry '380 at, e.g., col. 12.</p> <p>Thornton '429 at, e.g., fig. 4.</p> <p>Zuberec '032 at, e.g., col. 3.</p>
<p>16. The method of claim 9, further comprising accessing the user environment via a portable wireless device.</p>	<p>Ausems '403 at, e.g., col. 1, 7, 9.</p> <p>Belifore '513 at, e.g., col. 6, 19, 28.</p> <p>Bensimmon '678 at, e.g., pp. 1-3; fig. 1-2.</p> <p>Brummel '220 at, e.g., 14.</p> <p>Chasen '721 at, e.g., col. 6.</p> <p>Dourish '982 at, e.g., col. 2.</p> <p>Farnan '365 at, e.g., 3.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., p. 1.</p> <p>Hess CFS at, e.g., Abstract, § 3 (inc. fig. 3), § 5.</p> <p>Hess Manual at, e.g., § 7.</p> <p>Hess Thesis at, e.g., §§ 4.4, 4.6, 5.8.5, 7.4.</p> <p>Hind '791 at, e.g., col. 3, 5.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-2.</p> <p>iManage MailSite at, e.g., 103, 182-186.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Koren '596 at, e.g., col. 5, 16.</p> <p>Maritzen '181 at, e.g., p. 2-3.</p> <p>Oblinger '990 at, e.g., col. 14.</p> <p>Pitroda '990 at, e.g., cols. 6-7, 22; claims 17, 20, 22.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pizi '258 at, e.g., col. 6.</p> <p>Seliger '908 at, e.g., claim 23.</p> <p>Sykes '297 at, e.g., p. 2.</p> <p>Zuberec '032 at, e.g., abstract; col. 1; fig. 3-5.</p>
<p>21. A computer-readable medium for storing computer-executable instructions for a method of managing data, the method comprising:</p>	<p><i>See disclosures for claim 1, supra, which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 2-3, 6, 28; fig. 1.</p> <p>Bellotti '409 at, e.g., abstract; p. 3; fig. 19.</p> <p>Bensimmon '678 at, e.g., pp. 1, 3.</p> <p>Bly '853 at, e.g., abstract; col. 1.</p> <p>Brummel '220 at, e.g., abstract; col. 2-4; claim 24.</p> <p>Chasen '721 at, e.g., abstract; col. 6; claims 22, 33.</p> <p>Chronaki at, e.g., abstract.</p> <p>Dourish '217 at, e.g., abstract.</p> <p>Dourish '575 at, e.g., Abstract, Fig. 1, col. 2-3 (summary), 3-4 (detailed description), <i>passim</i>.</p> <p>Dourish '982 at, e.g., abstract.</p> <p>Dourish Building Bridges at, e.g., Abstract, 14-16.</p> <p>Dourish Presto at, e.g., p. 1.</p> <p>Edwards '076 at, e.g., abstract.</p> <p>Edwards '553 at, e.g., abstract.</p> <p>Estrada '148 at, e.g., abstract; col. 5-6; claims 22-24.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 1-2.</p> <p>Faman '365 at, e.g., abstract; col. 1-2; claim 1.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., abstract; col. 4.</p> <p>Gongwer '118 at, e.g., col. 1, 3; claim 31.</p> <p>Grambihler '655 at, e.g., abstract; col. 2-4; fig. 1; claim 27.</p> <p>Henderson '534 at, e.g., abstract; pp. 1, 3-4; claim 1.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 5, <i>passim</i>.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Hess Manual at, e.g., §§ 1, <i>passim</i>.</p> <p>Hess Thesis at, e.g., §§ 1.1, 1.2, 1.4, 2.1, 3.1, <i>passim</i>.</p> <p>Hind '791 at, e.g., abstract; col. 1, 3; fig. 2; claim 25.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-3; fig. 1; claims 1, 18.</p> <p>Hubert '934 at, e.g., Abstract, col. 1-4.</p> <p>Hugh '032 at, e.g., abstract; col. 2, 26-27.</p> <p>iManage MailSite at, e.g., Chapter 2.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., Abstract, col. 2-3 (summary), 4-6.</p> <p>Koren '596 at, e.g., abstract; col. 5; fig. 1, 2, 5A, 14.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2.</p> <p>LaMarca '682 at, e.g., abstract.</p> <p>Lamping '538 at, e.g., col. 1.</p> <p>Lamping '551 at, e.g., Abstract, col. 7-8, 10-12, <i>passim</i>.</p> <p>MacNaughton '892 at, e.g., abstract; claim 23.</p> <p>Maritzen '181 at, e.g., abstract; claims 1, 22.</p> <p>Nochur '758 at, e.g., col. 3-4, 9.</p> <p>O'Rourke '813 at, e.g., abstract, col. 5; claims 1, 3, 5, 8, 10, 16, 20, 23, 30-32, 38-39.</p> <p>Oblinger '990 at, e.g., claim 23.</p> <p>Petersen '179 at, e.g., col. 1-2, 6, 15.</p> <p>Pitroda '990 at, e.g., col. 1-2; claim 23.</p> <p>Pizi '258 at, e.g., abstract; col. 6.</p> <p>Salisbury '231 at, e.g., abstract; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; claim 1.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 5, 9, 16-17; fig. 7.</p> <p>Seliger '908 at, e.g., abstract; col. 3-4, 6; claim 49.</p> <p>Shea '938 at, e.g., abstract; col. 5.</p> <p>Suchter '161 at, e.g., abstract; fig. 1A-1B, 6; claim 30.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Suchter '302 at, e.g., abstract; fig. 1A-1B, 6; claim 30.</p> <p>Swartz '994 at, e.g., col. 1, 3; fig. 3, 5.</p> <p>Sykes '297 at, e.g., abstract; p. 2; claim 15, 29.</p> <p>Terry '380 at, e.g., abstract.</p> <p>Thomton '429 at, e.g., abstract.</p> <p>Zuberec '032 at, e.g., abstract; col. 7; claims 13, 19, 24.</p>
<p>creating data related to user interaction of a user within a user workspace of a web-based computing platform using an application; dynamically associating metadata with the data, the data and metadata stored on the web-based computing platform, the metadata includes information related to the user of the user workspace, to the data, to the application and to the user workspace; tracking movement of the user from the user workspace to a second user workspace of the web-based computing platform; dynamically associating the data and the application with the second user workspace in the metadata such that the user employs the application and data from the second user workspace; and indexing the data created in the user workspace such that a plurality of different users can access the data via the metadata from a corresponding plurality of different user workspaces.</p>	<p><i>See disclosures for claim 1, supra, which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 2-4, 10-19, 20-21, 28-32, 43-45; fig. 1, 5.</p> <p>Bellotti '409 at, e.g., pp. 2-5, 11; claims 1-3, 6-8.</p> <p>Bensimmon '678 at, e.g., abstract; pp. 1, 3, 6; fig. 1-4.</p> <p>Bly '853 at, e.g., abstract; col. 1, 8-10, 15, 17-19, 24, 28-29; fig. 2; claim 1.</p> <p>Brummel '220 at, e.g., col. 2-10; fig. 4; claims 1, 3, 8, 24.</p> <p>Chasen '721 at, e.g., abstract; col. 1-6, 10-16; fig. 2; claim 1.</p> <p>Chronaki at, e.g., pp. 260-65; fig. 6-7.</p> <p>Dourish '217 at, e.g., col. 7, 9-10, 16; fig. 4.</p> <p>Dourish '575 at, e.g., col. 3-9, figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3, 6-7.</p> <p>Dourish Building Bridges at, e.g., Abstract, 14-19.</p> <p>Dourish Presto at, e.g., fig. 1, 2; pp. 1-2, 4-8, 11, 15-19.</p> <p>Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.</p> <p>Edwards '553 at, e.g., abstract; col. 7, 9-11, 14; fig. 1-2, 4, 9a-9b.</p> <p>Estrada '148 at, e.g., abstract; col. 5-6, 8, 12, 16-17, 21, 27-28; fig. 1-3, 5-6, 9-10, 12-15, 22; Table 1-2; claim 1, 4, 6, 10.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 3-7, 11-12; fig. 1.</p> <p>Farnan '365 at, e.g., abstract; col. 1-4, 10-13, 26; fig. 2, 4-10; Table 1A, 1C; claim 1, 2, 4.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 6-7; fig. 1, 8-10.</p> <p>Gongwer '118 at, e.g., col. 3-4, 6-10; claim 1, 8, 14-15, 17, 31.</p> <p>Grambihler '655 at, e.g., abstract; col. 1-2; fig. 1.</p> <p>Henderson '534 at, e.g., abstract; pp. 1-8; fig. 5, 7, 9; claims 1, 5, 7.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 2.3, 3.1, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 3.1, 3.2, 3.4, 3.4.1, 4.5, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 5.5.</p> <p>Hind '791 at, e.g., col. 3, 5-8, 12; fig. 1-2; claim 25, 31.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-2, 4-7, 9, 14, 27-28, 30-31; fig. 1-5.</p> <p>Hubert '934 at, e.g., col. 2-4, Fig. 1-2, col. 5-8.</p> <p>Hugh '032 at, e.g., col. 3, 5-6, 13, 20-22, 24, 27-28; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3-5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 2-3 (summary), 4-12 (description), figs. 2-12. claim 1.</p> <p>Koren '596 at, e.g., col. 1-2, 5, 9-11, 14-15, 21-23; fig. 2, 5A, 24A, 32.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2, 10-11; fig. 3, 5.</p> <p>LaMarca '682 at, e.g., abstract; col. 7-12; fig. 1; claim 1.</p> <p>Lamping '538 at, e.g., col. 1-4, 6-8.</p> <p>Lamping '551 at, e.g., abstract; cols. 2, 9-16, figs. 1-5.</p> <p>MacNaughton '892 at, e.g., abstract; col. 1-3, 5-8, 16-19; fig. 1A-1B, 3-4; claim 1, 6, 9, 12, 23.</p> <p>Maritzen '181 at, e.g., abstract; fig. 7-9; pp. 2-6; claims 9-13, 20, 22.</p> <p>Nochur '758 at, e.g., col. 5-7, 10, 13-14; fig. 2, 7.</p> <p>O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Oblinger '990 at, e.g., abstract; col. 5-12; fig. 1-3, 5; claims 23-24, 29.</p> <p>Petersen '179 at, e.g., col. 1-2, 6-7, 10, 13, 15, 17, 26, 28; fig. 5.</p> <p>Pitroda '990 at, e.g., col. 5-8, 13, 18-19, 21, 23, 52; fig. 6, 10, 10AA-10AE, 11A, 12, 13A, 14A, 15A, 17A, 19A, 20A, 21A, 22A, 23, 24; claim 10, 12, 13.</p> <p>Pizi '258 at, e.g., col. 2-7; claim 1, 5.</p> <p>Salisbury '231 at, e.g., col. 10-12, 16; fig. 1-2; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-12, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '313 at, e.g., claims 1, 3, 9.</p> <p>Seliger '648 at, e.g., col. 1-4, 7-9, 12, 14-15; fig. 16.</p> <p>Seliger '908 at, e.g., abstract; col. 2-9; fig. 1, 4, 14-16; claim 9, 11, 49.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 6, 8; fig. 1; claim 1, 4, 6, 12, 14.</p> <p>Suchter '161 at, e.g., col. 1, 4-6, 8, 14, 17-21, 25; fig. 1A-1B, 4B, 6.</p> <p>Suchter '302 at, e.g., col. 1, 4-6, 8, 14, 17-21, 25; fig. 1A-1B, 4B, 6.</p> <p>Swartz '994 at, e.g., 4, 6-10, 18-20; fig. 3.</p> <p>Sykes '297 at, e.g., abstract; p. 1; fig. 1, 3-13.</p> <p>Terry '380 at, e.g., col. 10-12, 14, , 17; fig. 1; claim 1, 11, 14-15.</p> <p>Thornton '429 at, e.g., abstract; col. 7-8, 10, 13-15; fig. 1, 4; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 2-3, 6-7; fig. 2; claim 1, 13, 19, 24.</p>
<p>23. A computer-implemented system that facilitates management of data, comprising:</p>	<p><i>See claim 1, supra, the disclosures of which are hereby incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 2-3; fig. 1.</p> <p>Bellotti '409 at, e.g., abstract; p. 3; fig. 19.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Bensimmon '678 at, e.g., pp. 1, 3.</p> <p>Bly '853 at, e.g., abstract; col. 1; claim 18.</p> <p>Brummel '220 at, e.g., abstract; col. 2, 4.</p> <p>Chasen '721 at, e.g., abstract; col. 6; claim 1.</p> <p>Chronaki at, e.g., abstract.</p> <p>Dourish '217 at, e.g., abstract.</p> <p>Dourish '575 at, e.g., Abstract, Fig. 1, col. 2-3 (summary), 3-4 (detailed description), <i>passim</i>.</p> <p>Dourish '982 at, e.g., abstract.</p> <p>Dourish Building Bridges at, e.g., Abstract, 14-16.</p> <p>Dourish Presto at, e.g., p. 1.</p> <p>Edwards '076 at, e.g., abstract.</p> <p>Edwards '553 at, e.g., abstract.</p> <p>Estrada '148 at, e.g., abstract; claim 1.</p> <p>Falkenhainer '801 at, e.g., abstract; col. 1-2.</p> <p>Farnan '365 at, e.g., abstract; col. 1-2; claim 1.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., abstract; col. 4.</p> <p>Gongwer '118 at, e.g., col. 1, 3.</p> <p>Grambihler '655 at, e.g., abstract; col. 2-4; fig. 1.</p> <p>Henderson '534 at, e.g., abstract. pp. 1, 3-4; claim 1.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 5, <i>passim</i>.</p> <p>Hess Manual at, e.g., §§ 1, <i>passim</i>.</p> <p>Hess Thesis at, e.g., §§ 1.1, 1.2, 1.4, 2.1, 3.1, <i>passim</i>.</p> <p>Hind '791 at, e.g., abstract; col. 1, 3; fig. 2; claim 50.</p> <p>Horvitz '484 at, e.g., abstract; pp. 1-3; fig. 1.</p> <p>Hubert '934 at, e.g., Abstract, col. 1-4.</p> <p>Hugh '032 at, e.g., abstract; col. 2, 26-27.</p> <p>iManage MailSite at, e.g., Chapter 2.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Jones '731 at, e.g., Abstract, col. 2-3 (summary), 4-6.</p> <p>Koren '596 at, e.g., abstract; col. 5; fig. 1-2, 5A, 14.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2.</p> <p>LaMarca '682 at, e.g., abstract.</p> <p>Lamping '538 at, e.g., col. 1.</p> <p>Lamping '551 at, e.g., Abstract, col. 7-8, 10-12, <i>passim</i>.</p> <p>MacNaughton '892 at, e.g., abstract.</p> <p>Maritzen '181 at, e.g., abstract; claim 1.</p> <p>Nochur '758 at, e.g., col. 3-4, 9.</p> <p>O'Rourke '813 at, e.g., abstract, col. 5; claims 1, 3, 5, 8, 10, 16, 20, 23, 30-32, 38-39.</p> <p>Oblinger '990 at, e.g., abstract; claim 1.</p> <p>Petersen '179 at, e.g., col. 1-2, 6.</p> <p>Pitroda '990 at, e.g., col. 1-2; claims 1, 12.</p> <p>Pizi '258 at, e.g., abstract; col. 6.</p> <p>Salisbury '231 at, e.g., abstract; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; claim 6.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., 1-2, 5, 9; fig. 7.</p> <p>Seliger '908 at, e.g., abstract, col. 3-4; claim 35.</p> <p>Shea '938 at, e.g., abstract.</p> <p>Suchter '161 at, e.g., abstract; fig. 1A-1B, 6.</p> <p>Suchter '302 at, e.g., abstract; fig. 1A-1B, 6.</p> <p>Swartz '994 at, e.g., col. 1, 3.</p> <p>Sykes '297 at, e.g., abstract.</p> <p>Terry '380 at, e.g., abstract.</p> <p>Thornton '429 at, e.g., abstract.</p> <p>Zuberec '032 at, e.g., abstract; col. 7.</p>
a computer-implemented context component of a web-based server for defining a first user workspace	<i>See claim 1, supra, the disclosures of which are hereby incorporated herein by reference.</i>

Claim Language of '761 Patent	Invalidating Prior Art
<p>of the web-based server, assigning one or more applications to the first user workspace, capturing context data associated with user interaction of a user while in the first user workspace, and for dynamically storing the context data as metadata on a storage component of the web-based server, which metadata is dynamically associated with data created in the first user workspace; and a computer-implemented tracking component of the web-based server for tracking change information associated with a change in access of the user from the first user workspace to a second user workspace, and dynamically storing the change information on the storage component as part of the metadata, wherein the user accesses the data from the second user workspace.</p>	<p>Belifore '513 at, e.g., col. 2-4, 10-17, 20-21, 28-32; fig. 1.  Bellotti '409 at, e.g., pp. 2-5, 11; claims 1-3, 6-8.  Bensimmon '678 at, e.g., abstract; pp. 1, 3, 6; fig. 1-4.  Bly '853 at, e.g., abstract; col. 1, 8-10, 17-19, 24, 28-29; fig. 2.  Brummel '220 at, e.g., col. 2-10; claims 1, 3, 8.  Chasen '721 at, e.g., abstract; col. 1-5, 10-16; fig. 2; claim 1.  Chronaki at, e.g., pp. 260-65; fig. 6-7.  Dourish '217 at, e.g., col. 7, 10, 16; fig. 4.  Dourish '575 at, e.g., col. 3-9, figs. 1-7.  Dourish '982 at, e.g., col. 3, 6-7.  Dourish Building Bridges at, e.g., Abstract, 14-19.  Dourish Presto at, e.g., fig. 1, 3; pp. 4, 6-7, 10-11, 15-16, 18.  Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.  Edwards '553 at, e.g., abstract; col. 7, 9-11, 14; fig. 1-2, 4, 9a-9b.  Estrada '148 at, e.g., abstract; col. 5-6, 8, 12, 17, 21, 27-28; fig. 1-3, 5-6, 9-10, 12-15, 22; Table 1-2; claim 1, 4, 6, 10.  Falkenhainer '801 at, e.g., abstract; col. 3-7, 11-12; fig. 1.  Farnan '365 at, e.g., abstract; col. 1-4, 11-13; fig. 2, 4-9; Table 1A, 1C; claim 1, 2, 4, 26.  Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.  Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10.  Gongwer '118 at, e.g., col. 3-4, 6-11; claims 1, 8, 14-15.  Grambihler '655 at, e.g., col. 1-2.  Henderson '534 at, e.g., abstract; pp. 1-4, 6-8; fig. 5, 7, 9; claims 1, 5, 7.  Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 2.3, 3.1, 4.3, 5, 6.  Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.  Hess Thesis at, e.g., §§ 3.1, 3.2, 3.4, 3.4.1, 4.5, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 5.5.  Hind '791 at, e.g., col. 3, 5-8, 12; fig. 2; claims 7, 50.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Horvitz '484 at, e.g., abstract; pp. 1-2, 5-7, 9, 14, 27-28, 30-31; fig. 1-5.</p> <p>Hubert '934 at, e.g., col. 2-4, Fig. 1-2, col. 5-8.</p> <p>Hugh '032 at, e.g., col. 5-6, 13, 20, 24, 27-28; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3-5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 2-3 (summary), 4-12 (description), figs. 2-12. claim 1.</p> <p>Koren '596 at, e.g., col. 1-2, 5, 10, 14-15, 21-23; fig. 2, 5A, 24A, 32.</p> <p>LaMarca '670 at, e.g., abstract; col. 1-2, 10-11; fig. 3, 5.</p> <p>LaMarca '682 at, e.g., abstract; col. 7-8, 10-12; fig. 1; claim 1.</p> <p>Lamping '538 at, e.g., col. 1-3, 6-8.</p> <p>Lamping '551 at, e.g., abstract; cols. 2, 9-16, figs. 1-5.</p> <p>MacNaughton '892 at, e.g., abstract; col. 1-3, 6-8, 16-19; fig. 1A-1B, 3-4; claim 1, 12.</p> <p>Maritzen '181 at, e.g., abstract; pp 3-4, 6; fig. 7-9; claims 9-13; 20.</p> <p>Nochur '758 at, e.g., col. 5-7, 10, 13-14; fig. 2, 7.</p> <p>O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.</p> <p>Oblinger '990 at, e.g., abstract; col. 5-10; fig. 1-3, 5; claim 1-2, 4-5, 8, 10-11.</p> <p>Petersen '179 at, e.g., col. 1-3, 6-7, 10, 15, 17, 26; fig. 5.</p> <p>Pitroda '990 at, e.g., col. 5-8, 12-13, 19, 21, 23, 52; fig. 6, 10AA-10AE, 11A, 12, 13A, 14A, 15A, 17A, 19A, 20A, 21A, 22A, 23, 24; claim 1, 10, 12.</p> <p>Pizi '258 at, e.g., col. 2, 4-7; claim 1, 5.</p> <p>Salisbury '231 at, e.g., col. 9-11, 16; fig. 1-2; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-12, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '313 at, e.g., claims 1, 3, 9.</p> <p>Seliger '648 at, e.g., col. 1-4, 5, 7-9, 12, 14-15; fig. 7, 16.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Seliger '908 at, e.g., abstract; col. 2-5, 8-9; fig. 1, 4, 7; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 6, 8; fig. 1; claims 1, 4, 6, 12, 14.</p> <p>Suchter '161 at, e.g., col. 1, 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.</p> <p>Suchter '302 at, e.g., col. 1, 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.</p> <p>Swartz '994 at, e.g., col. 4, 6-10, 17, 19-20; fig. 5.</p> <p>Sykes '297 at, e.g., abstract; p. 1; fig. 1, 3-13.</p> <p>Terry '380 at, e.g., col. 10-12, 14, , 17; fig. 1; claim 1, 11, 14-15.</p> <p>Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1, 4; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 2-3, 6-7; claims 1, 13.</p>
<p>24. The system of claim 23, wherein the tracking component automatically creates the metadata when the user accesses the first user workspace.</p>	<p><i>See disclosures for claim 8, supra, the disclosures of which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 31-32.</p> <p>Bellotti '409 at, e.g., p. 10.</p> <p>Bensimmon '678 at, e.g., pp. 1, 6.</p> <p>Bly '853 at, e.g., col. 23-24, 26-27; fig. 13.</p> <p>Brummel '220 at, e.g., col. 6.</p> <p>Chasen '721 at, e.g., col. 4-5, 16-17.</p> <p>Chronaki at, e.g., pp. 260-64.</p> <p>Dourish '217 at, e.g., col. 4-5, 15-16.</p> <p>Dourish '575 at, e.g., col. 4-8 (discussion of initial filing context); figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3, 5-8; fig. 8.</p> <p>Dourish Building Bridges at, e.g., 14-16, fig. 2, 17-18 (categories, including fig. 3).</p> <p>Dourish Presto at, e.g., pp. 4-5, 15-19.</p> <p>Dourish Presto at, e.g., §§ 6.1. pp. 15-19, 7-11, 4; fig. 2, 3.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Edwards '076 at, e.g., col. 11.</p> <p>Edwards '553 at, e.g., col. 11-13.</p> <p>Estrada '148 at, e.g., col. 13.</p> <p>Falkenhainer '801 at, e.g., col. 3-4.</p> <p>Farnan '365 at, e.g., col. 4.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 7.</p> <p>Gongwer '118 at, e.g., col. 3.</p> <p>Grambihler '655 at, e.g., col. 4-8; fig. 1.</p> <p>Henderson '534 at, e.g., pp. 5, 9.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., 8, 10.</p> <p>Horvitz '484 at, e.g., pp. 6-7, 27-28, 30-31.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1.</p> <p>Hugh '032 at, e.g., col. 5-6, 13; fig. 1, 3.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 4-6, 9-12, figs. 4(404), 6-8, 12.</p> <p>Koren '596 at, e.g., col. 2, 15, 21.</p> <p>LaMarca '670 at, e.g., col. 9.</p> <p>Lamping '551 at, e.g., col. 11, 14-16, fig. 5.</p> <p>MacNaughton '892 at, e.g., col. 17.</p> <p>Maritzen '181 at, e.g., p. 2.</p> <p>Nochur '758 at, e.g., col. 5.</p> <p>O'Rourke '813 at, e.g., col. 6-7; fig. 6.</p> <p>Oblinger '990 at, e.g., col. 6; claim 21.</p> <p>Petersen '179 at, e.g., col. 10, 17.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pitroda '990 at, e.g., col. 8, 13, 19.</p> <p>Salisbury '231 at, e.g., col. 11.</p> <p>Salisbury '573 at, e.g., col. 11-12, 16-17; fig. 3, 6.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2.</p> <p>Seliger '908 at, e.g., col. 2-5, 8-9.</p> <p>Shea '938 at, e.g., col. 6.</p> <p>Suchter '161 at, e.g., col. 7.</p> <p>Suchter '302 at, e.g., col. 7.</p> <p>Swartz '994 at, e.g., col. 6-8.</p> <p>Terry '380 at, e.g., col. 11-12.</p> <p>Thornton '429 at, e.g., col. 11, 13-14; fig. 4-5.</p>
<p>25. The system of claim 23, wherein the context component captures relationship data associated with a relationship between the first user workspace and at least one other user workspace.</p>	<p><i>See claim 5, supra, the disclosures of which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 15-16.</p> <p>Bellotti '409 at, e.g., p. 5; claims 1-2.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 24, 28-29.</p> <p>Brummel '220 at, e.g., col. 3, 5-6; fig. 4.</p> <p>Chasen '721 at, e.g., col. 14-15.</p> <p>Chronaki at, e.g., pp. 260-61; fig. 7.</p> <p>Dourish '217 at, e.g., col. 7-8; fig. 1, 3.</p> <p>Dourish '575 at, e.g., col. 4-8 (discussion of initial filing context); figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 5.</p> <p>Dourish Building Bridges at, e.g., 14-16 &amp; fig. 2, 16.</p> <p>Dourish Presto at, e.g., fig. 2, 3; pp. 4, 9-10, 16-19.</p> <p>Edwards '076 at, e.g., col. 9, 13-14; fig. 1, 3.</p> <p>Edwards '553 at, e.g., col. 9-13; fig. 1, 2.</p> <p>Estrada '148 at, e.g., 17, 21; Table 2.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Falkenhainer '801 at, e.g., col. 5, 13.</p> <p>Farnan '365 at, e.g., col. 5-6.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 3-4; fig. 1.</p> <p>Gongwer '118 at, e.g., col. 9-10.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., abstract; p. 6.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3-5, 7-8, claim 50.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1(16).</p> <p>Hugh '032 at, e.g., col. 5-6, 13; fig. 1-3.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 7-10, fig. 6-11, fig. 12 (showing multiple contexts).</p> <p>Koren '596 at, e.g., col. 15, 21.</p> <p>LaMarca '670 at, e.g., col. 9-11.</p> <p>LaMarca '682 at, e.g., col. 7-8, fig. 1.</p> <p>Lamping '538 at, e.g., col. 6-7.</p> <p>Lamping '551 at, e.g., col. 12-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 8, 17.</p> <p>Maritzen '181 at, e.g., pp. 5-6.</p> <p>Nochur '758 at, e.g., col. 3-4.</p> <p>O'Rourke '813 at, e.g., fig. 5.</p> <p>Oblinger '990 at, e.g., fig. 3, 5.</p> <p>Petersen '179 at, e.g., col. 6-7.</p> <p>Pitroda '990 at, e.g., col. 6, 8, 13.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pizi '258 at, e.g., col. 5-7.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1.</p> <p>Salisbury '573 at, e.g., col. 8; fig. 1.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 3-4, 6; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 5, 8; fig. 1.</p> <p>Suchter '161 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Suchter '302 at, e.g., col. 14; fig. 3A-3B, 4A.</p> <p>Swartz '994 at, e.g., col. 4, 6, 19.</p> <p>Terry '380 at, e.g., fig. 1; claims 1, 11, 15.</p> <p>Thornton '429 at, e.g., fig. 3.</p> <p>Zuberec '032 at, e.g., col. 6-7; claims 16, 21.</p>
<p>26. The system of claim 23, wherein an application associated with the first user workspace is automatically accessible via the second user workspace when the user moves from the first user workspace to the second user workspace.</p>	<p>Belifore '513 at, e.g., col. 16-17, 20, 29, 43-45.</p> <p>Bellotti '409 at, e.g., pp. 5-6; fig. 9-10.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 23-24, 26-27; fig. 13.</p> <p>Brummel '220 at, e.g., col. 3-6; fig. 4.</p> <p>Chasen '721 at, e.g., col. 4-5, 16-17.</p> <p>Chronaki at, e.g., pp. 260-61.</p> <p>Dourish '217 at, e.g., col. 4-5, 15-16.</p> <p>Dourish '575 at, e.g., col. 4-8; figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3, 5-8; fig. 8.</p> <p>Dourish Building Bridges at, e.g., 14-17, figs 2-3.</p> <p>Dourish Presto at fig. 3; pp. 3, 6-8, 12, 16-18; claim 1.</p> <p>Edwards '076 at, e.g., col. 7, 9.</p> <p>Edwards '553 at, e.g., col. 7, 9; fig. 1, 2.</p> <p>Estrada '148 at, e.g., col. 21.</p> <p>Falkenhainer '801 at, e.g., col. 3-4.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Farnan '365 at, e.g., col. 10.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 7.</p> <p>Gongwer '118 at, e.g., claims 14-15.</p> <p>Grambihler '655 at, e.g., col. 4-8; fig. 1.</p> <p>Henderson '534 at, e.g., p. 3.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3, 5.</p> <p>Horvitz '484 at, e.g., p. 4.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2(30, 32, 34).</p> <p>Hugh '032 at, e.g., col. 2, 6, 17-18, 21-22.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 7-11, figs. 6-10, 12.</p> <p>Koren '596 at, e.g., col. 9-10.</p> <p>LaMarca '670 at, e.g., col. 9-11.</p> <p>LaMarca '682 at, e.g., 7, 14; fig. 1.</p> <p>Lamping '538 at, e.g., col. 7-8.</p> <p>Lamping '551 at, e.g., col. 13-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 1-2, 5-8.</p> <p>Maritzen '181 at, e.g., pp. 6.</p> <p>Nochur '758 at, e.g., col. 3-4, 12.</p> <p>O'Rourke '813 at, e.g., col. 6-7; fig. 6.</p> <p>Oblinger '990 at, e.g., col. 6-9, 14; fig. 2.</p> <p>Petersen '179 at, e.g., col. 11.</p> <p>Pitroda at figs. 10AA-10AE, 11A, 12, 13A, 14A, 15A, 17A, 19A, 20A, 21A, 22A, 23, 24; cols. 12, 18, 21.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pizi '258 at, e.g., col. 5-6.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1.</p> <p>Salisbury '573 at, e.g., col. 8, 11-12, 16-17; fig. 1, 3, 6.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., fig. 16.</p> <p>Seliger '908 at, e.g., col. 1-2.</p> <p>Shea '938 at, e.g., abstract; fig. 2-3, 6-7.</p> <p>Suchter '161 at, e.g., col. 9-11; fig. 3A-3B.</p> <p>Suchter '302 at, e.g., col. 9-11; fig. 3A-3B.</p> <p>Swartz '994 at, e.g., col. 20.</p> <p>Terry '380 at, e.g., col. 9, 17-18.</p> <p>Thornton '429 at, e.g., col. 11, 13-14; fig. 4-5.</p> <p>Zuberec '032 at, e.g., abstract; col. 1-2, 7; fig. 5.</p>
<p>29. The system of claim 23, wherein when the data created in the first user workspace is accessed from the second user workspace, in response to which the context component adds information to the metadata about the second user workspace.</p>	<p>Belifore '513 at, e.g., col. 10-17, 20-21, 29-31; fig. 5.</p> <p>Bellotti '409 at, e.g., pp. 4-5, 11; claims 6-8.</p> <p>Bensimmon '678 at, e.g., pp. 1, 6.</p> <p>Bly '853 at, e.g., col. 1, 8-10, 17-19, 24.</p> <p>Brummel '220 at, e.g., col. 3, 6, 9-10; claims 3, 8.</p> <p>Chasen '721 at, e.g., abstract; col. 1-5, 14-16; fig. 2.</p> <p>Chronaki at, e.g., pp. 260-65; fig. 7.</p> <p>Dourish '217 at, e.g., col. 16.</p> <p>Dourish '575 at, e.g., col. 4-8; figs. 1-7.</p> <p>Dourish '982 at, e.g., col. 3, 6-7.</p> <p>Dourish Building Bridges at, e.g., 14-19, figs. 2-3.</p> <p>Dourish Presto at figs. 2, 3; pp. 4, 7, 18.</p> <p>Edwards '076 at, e.g., col. 14-16.</p> <p>Edwards '553 at, e.g., col. 7, 9, 11-13.</p> <p>Estrada '148 at, e.g., col. 8, 21; fig. 10, 14-15; Table 2.</p> <p>Falkenhainer '801 at, e.g., col. 1-6, 11-12.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	<p>Farnan '365 at, e.g., abstract; col. 2-4, 11-13; fig. 4-9; Table 1A, 1C; claims 2, 4, 26.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 7.</p> <p>Gongwer '118 at, e.g., col. 7, 9-10; claims 1, 8, 14-15.</p> <p>Grambihler '655 at, e.g., col. 1-2.</p> <p>Henderson '534 at, e.g., pp. 1, 3, 6-8; fig. 7; claims 1, 5.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 8, 12; fig. 2; claims 1, 7, 50.</p> <p>Horvitz '484 at, e.g., pp. 1-2, 30-31; fig. 1, 3-5, 8.</p> <p>Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2(30, 32, 34).</p> <p>Hugh '032 at, e.g., col. 20, 24, 27-28.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 7-11, figs. 6-10, 12.</p> <p>Koren '596 at, e.g., col. 2, 10, 14-15, 21; fig. 35-36.</p> <p>LaMarca '670 at, e.g., col. 10-11.</p> <p>LaMarca '682 at, e.g., col. 7-8, 14.</p> <p>Lamping '538 at, e.g., col. 2, 7-8.</p> <p>Lamping '551 at, e.g., col. 13-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 6-8, 16-19; fig. 1A-1B, 3-4.</p> <p>Maritzen '181 at, e.g., abstract; pp. 3-4, 6; fig. 7, 9; claim 12.</p> <p>Nochur '758 at, e.g., col. 6, 10, 13-14.</p> <p>O'Rourke '813 at, e.g., 2, 4-8; fig. 3, 5; claims 1, 23.</p> <p>Oblinger '990 at, e.g., abstract; col. 6-9; fig. 1-2; claim 1, 4-5, 8, 11.</p> <p>Pitroda at cols. 6, 8, 13, 21.</p> <p>Pizi '258 at, e.g., col. 2, 4-5, 7; claim 1.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Salisbury '231 at, e.g., col. 10; claim 12.</p> <p>Salisbury '573 at, e.g., abstract; col. 8, 10-11, 13; fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 2-5, 8-9; fig. 1, 4, 7; claim 35.</p> <p>Shea '938 at, e.g., abstract; col. 2-3, 8; fig. 1; claim 4, 6, 12, 14.</p> <p>Suchter '161 at, e.g., col. 5, 19-20; fig. 4B.</p> <p>Suchter '302 at, e.g., col. 5, 19-20; fig. 4B.</p> <p>Swartz '994 at, e.g., col. 6-9, 19.</p> <p>Terry '380 at, e.g., col. 9, 17-18.</p> <p>Thornton '429 at, abstract; col. 7-8, 13; fig. 1; claim 12.</p> <p>Zuberec '032 at, e.g., abstract; col. 6-7; claims 1, 13.</p>
<p>31. The system of claim 23, wherein the storage component stores the data and the metadata according to at least one of a relational and an object storage methodology.</p>	<p>Belifore '513 at, e.g., col. 28; fig. 7.</p> <p>Chasen '721 at, e.g., col. 10.</p> <p>Dourish '575 at, e.g., col. 2 (relational), 3-4 (databases), 8-9.</p> <p>Dourish Building Bridges at, e.g., 16 (object attributes), 18.</p> <p>Dourish Presto at, e.g., § 3.2, at 7, § 3.4 at 8, 19.</p> <p>Farnan '365 at, e.g., col. 23.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Henderson '534 at, e.g., p. 2; fig. 6.</p> <p>Hess CFS at, e.g., §§ 1, 2.1, 2.2, 3.1.</p> <p>Hess Manual at, e.g., §§ 1, 2.1, 4, 5.</p> <p>Hess Thesis at, e.g., §§ 3.4.1, 4.1.</p> <p>Hubert '934 at, e.g., col. 5-6 (DOM, RDF, XML, referring to object storage methodologies).</p> <p>iManage MailSite at, e.g., 284.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Jones '731 at, e.g., fig. 4 (showing relational rows and columns), col. 6-7, 10-12, <i>passim</i> (object storage).</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Koren '596 at, e.g., col. 1.</p> <p>Lamping '551 at, e.g., col. 6 (distributed databases, SQL, are relational).</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Microsoft Dictionary at, e.g., p. 403-404 (definition of relational database).</p> <p>Oblinger '990 at, e.g., abstract; col. 9-10.</p> <p>Petersen '179 at, e.g., col. 6, 14-15, 25.</p> <p>Pitroda at claim 19.</p> <p>Salisbury '231 at, e.g., col. 16.</p> <p>Seliger '648 at, e.g., col. 7.</p> <p>Seliger '908 at, e.g., col. 7.</p> <p>Swartz '994 at, e.g., col. 5, 18.</p>
<p>32. The system of claim 23, wherein storing of the metadata in the storage component in association with data facilitates many-to-many functionality of the data via the metadata.</p>	<p><i>See claim 9, supra, the disclosures of which are incorporated herein by reference.</i></p> <p>Belifore '513 at, e.g., col. 12-15, 28-29.</p> <p>Bellotti '409 at, e.g., p. 5; claims 1-3.</p> <p>Bensimmon '678 at, e.g., p. 1.</p> <p>Bly '853 at, e.g., col. 24, 28-29.</p> <p>Brummel '220 at, e.g., col. 2-3; fig. 4.</p> <p>Chasen '721 at, e.g., col. 11-14.</p> <p>Chronaki at, e.g., fig. 7.</p> <p>Dourish '217 at, e.g., fig. 1, 3.</p> <p>Dourish '575 at, e.g., figs. 1-7, cols. 4-9, <i>passim</i>.</p> <p>Dourish '982 at col. 3-4.</p> <p>Dourish Building Bridges at, e.g., 14-18, figs. 2-3.</p> <p>Dourish Presto at figs. 2, 3; pp. 4, 7, 18.</p> <p>Edwards '076 at, e.g., fig. 1, 3.</p> <p>Edwards '553 at, e.g., fig. 1.</p> <p>Estrada '148 at, e.g., col. 17; Table 2.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Falkenhainer '801 at, e.g., col. 6.</p> <p>Farnan '365 at, e.g., col. 3-6; fig. 10, 12.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10.</p> <p>Gongwer '118 at, e.g., col. 1; claims 1, 45.</p> <p>Grambighler '655 at, e.g., col. 5-7.</p> <p>Henderson '534 at, e.g., pp. 2-6.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 11.</p> <p>Horvitz '484 at, e.g., pp. 1-2; 2-28, 30-31; fig. 1, 3-5.</p> <p>Hubert '934 at, e.g., fig. 2 (30, 32, 34); col. 2-3, 4-5, 7-8.</p> <p>Hugh '032 at, e.g., col. 20, 24, 27-28.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 6-8, 11-12, fig. 6-10, 12.</p> <p>Koren '596 at, e.g., col. 15.</p> <p>LaMarca '670 at, e.g., fig. 3.</p> <p>LaMarca '682 at, e.g., col. 7-8, 14; fig. 1.</p> <p>Lamping '538 at, e.g., col. 4, 8.</p> <p>Lamping '551 at, e.g., col. 13-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 5-8, 16-19.</p> <p>Maritzen '181 at, e.g., p. 5.</p> <p>Nochur '758 at, e.g., col. 5.</p> <p>O'Rourke '813 at, e.g., fig. 5.</p> <p>Oblinger '990 at, e.g., col. 9-10.</p> <p>Petersen '179 at, e.g., col. 13.</p> <p>Pitroda at col. 21.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Pizi '258 at, e.g., col. 7-8.</p> <p>Salisbury '231 at, e.g., col. 9-10; fig. 1, 2.</p> <p>Salisbury '573 at, e.g., fig. 1, 3.</p> <p>Schroeter pp. 318-19.</p> <p>Seliger '648 at, e.g., col. 2, 8-9.</p> <p>Seliger '908 at, e.g., col. 2, 6, 10.</p> <p>Shea '938 at, e.g., col. 5, 11-13.</p> <p>Suchter '161 at, e.g., col. 8; fig. 3A-3B.</p> <p>Suchter '302 at, e.g., col. 8; fig. 3A-3B.</p> <p>Swartz '994 at, e.g., 1, 3, 6-9, 20.</p> <p>Terry '380 at, e.g., fig. 1.</p> <p>Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1; claim 12.</p> <p>Zuberec '032 at, e.g., col. 4, 6-7.</p>
<p>33. The system of claim 23, wherein the first user workspace provides access to at least one communications tool, which includes e-mail, voicemail, fax, teleconferencing, instant message, chat, contacts, calendar, task, notes, news, ideas, vote, web and video conferencing, and document sharing functionality.</p>	<p>Belifore '513 at, e.g., col. 4, 19, 33, 43-45.</p> <p>Bellotti '409 at, e.g., abstract; pp. 2, 8; fig. 1, 9, 14-15.</p> <p>Bensimmon '678 at, e.g., pp. 2-3.</p> <p>Bly '853 at, e.g., col. 15.</p> <p>Brummel '220 at, e.g., col. 13.</p> <p>Chasen '721 at, e.g., col. 17.</p> <p>Chronaki at, e.g., pp. 260-61.</p> <p>Dourish '217 at, e.g., col. 11.</p> <p>Dourish '575 at, e.g., col. 3-9, figs. 1-7, passim (shared document repository for document sharing).</p> <p>Dourish Building Bridges at, e.g., 14-16, figs. 2-3 (all discussing document sharing).</p> <p>Dourish Presto at pp. 4, 6-7, 9-11.</p> <p>Edwards '076 at, e.g., col. 11.</p> <p>Edwards '553 at, e.g., col. 11; fig. 1, 2.</p> <p>Estrada '148 at, e.g., col. 8.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Falkenhainer '801 at, e.g., col. 4.</p> <p>Farnan '365 at, e.g., abstract; col. 17-22; Table 1A.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Grambihler '655 at, e.g., col. 1, 6.</p> <p>Henderson '534 at, e.g., abstract, p. 6.</p> <p>Hess CFS at, e.g., §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 6 (document sharing between contexts).</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 7.</p> <p>Hess Thesis at, e.g., §§ 2.1, 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5 (document sharing).</p> <p>Hind '791 at, e.g., col. 5.</p> <p>Horvitz '484 at, e.g., pp. 1, 4, 13, 21, 32; fig. 6.</p> <p>Hubert '934 at, e.g., col. 3, 7(email), 6 (email and document management), <i>passim</i> (document sharing is pervasive in this reference).</p> <p>Hugh '032 at, e.g., col. 26; fig. 15.</p> <p>iManage MailSite at, e.g., Chapter 5 (e.g., Outlook).</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Johnson at, e.g., p. 187.</p> <p>Jones '731 at, e.g., col. 11-12, 6-7.</p> <p>Koren '596 at, e.g., col. 11.</p> <p>LaMarca '670 at, e.g., col. 9.</p> <p>LaMarca '682 at, e.g., col. 11.</p> <p>Lamping '538 at, e.g., col. 3.</p> <p>Lamping '551 at, e.g., col. 11, fig. 3 (10a-10n, 11a-11n).</p> <p>MacNaughton '892 at, e.g., col. 4, 7; claim 5.</p> <p>Maritzen '181 at, e.g., fig. 5.</p> <p>Nochur '758 at, e.g., col. 5, 9-10, 13.</p> <p>Pitroda at col. 8.</p> <p>Pizi '258 at, e.g., col. 5, 9.</p> <p>Salisbury '231 at, e.g., col. 11.</p> <p>Salisbury '573 at, e.g., abstract; col. 11.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Seliger '648 at, e.g., col. 11.</p> <p>Seliger '908 at, e.g., claim 23.</p> <p>Swartz '994 at, e.g., col. 9, 19.</p> <p>Terry '380 at, e.g., col. 11.</p> <p>Thornton '429 at, e.g., col. 11.</p> <p>Zuberec '032 at, e.g., abstract; col. 1, 3-4; claim 1, 11.</p>
<p>34. The system of claim 23, wherein one or more applications include file storage pointers that are dynamic and associated with the first user workspace.</p>	<p>Belifore '513 at, e.g., col. 34.</p> <p>Bellotti '409 at, e.g., p. 2.</p> <p>Bensimmon '678 at, e.g., pp. 5-6.</p> <p>Bly '853 at, e.g., col. 4, 28.</p> <p>Brummel '220 at, e.g., col. 4.</p> <p>Chasen '721 at, e.g., col. 10, 17.</p> <p>Chronaki at, e.g., pp. 260, 262; fig. 4-5.</p> <p>Dourish '217 at, e.g., col. 11, 13.</p> <p>Dourish '575 at, e.g., col. 4-8 (inc. discussion of initial filing context/filing structure mappings).</p> <p>Dourish '982 at, e.g., col. 6.</p> <p>Dourish Building Bridges at, e.g., 14-18, figs. 2-3.</p> <p>Dourish Presto at, e.g., fig. 1; pp. 7, 15.</p> <p>Dourish Presto at, e.g., § 3.3 at 7-8, Fig. 2.</p> <p>Edwards '076 at, e.g., col. 14.</p> <p>Edwards '553 at, e.g., col. 14.</p> <p>Estrada '148 at, e.g., col. 8; fig. 14, 25.</p> <p>Falkenhainer '801 at, e.g., col. 5, 13.</p> <p>Farnan '365 at, e.g., Table 1A.</p> <p>Gaia/CFS, e.g., see disclosures for Hess CFS, <i>supra</i>.</p> <p>Gillings '490 at, e.g., col. 4-5.</p> <p>Gongwer '118 at, e.g., col. 5, 9-10; claim 7.</p> <p>Grambihler '655 at, e.g., col. 3-4.</p>

Claim Language of '761 Patent	Invalidating Prior Art
	<p>Henderson '534 at, e.g., pp. 2-3.</p> <p>Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.1, 4.2, 4.3, 5, 6.</p> <p>Hess Manual at, e.g., §§ 1, 2.2, 2.2.1, 2.3.</p> <p>Hess Thesis at, e.g., §§ 3.1, 3.2, 4.5, 4.5.1, 4.5.2, 4.5.4, 4.5.5.</p> <p>Hind '791 at, e.g., col. 3, 5; fig. 1-2.</p> <p>Horvitz '484 at, e.g., p. 10.</p> <p>Hubert '934 at, e.g., col. 4-5; fig. 2(14, 16).</p> <p>Hugh '032 at, e.g., col. 21-22.</p> <p>iManage MailSite at, e.g., Chapters 3 &amp; 5.</p> <p>iManage System, e.g., see disclosures for iManage MailSite.</p> <p>Jones '731 at, e.g., col. 5-11, fig. 4, 6-10, 12.</p> <p>Koren '596 at, e.g., col. 6, 11.</p> <p>LaMarca '670 at, e.g., col. 9.</p> <p>LaMarca '682 at, e.g., col. 12.</p> <p>Lamping '538 at, e.g., col. 4-5; fig. 2.</p> <p>Lamping '551 at, e.g., col. 11-16, fig. 1-5.</p> <p>MacNaughton '892 at, e.g., col. 8.</p> <p>Maritzen '181 at, e.g., p. 6.</p> <p>Nochur '758 at, e.g., col. 8.</p> <p>Oblinger '990 at, e.g., col. 6.</p> <p>Petersen '179 at, e.g., col. 1-2.</p> <p>Pitroda '990 at, e.g., col. 7, 23, 52.</p> <p>Pizi '258 at, e.g., col. 6.</p> <p>Salisbury '231 at, e.g., col. 13, 16; claim 1.</p> <p>Salisbury '573 at, e.g., col. 12.</p> <p>Seliger '648 at, e.g., col. 13.</p> <p>Seliger '908 at, e.g., abstract; col. 3-4, 6; claim 49.</p> <p>Shea '938 at, e.g., col. 5-6.</p> <p>Suchter '161 at, e.g., col. 4-5.</p> <p>Suchter '302 at, e.g., col. 4-5.</p>



Claim Language of '761 Patent	Invalidating Prior Art
	Swartz '994 at, e.g., col. 20. Sykes '297 at, e.g., p. 1. Terry '380 at, e.g., col. 15; claims 2, 16. Thornton '429 at, e.g., fig. 4. Zuberec '032 at, e.g., col. 12.

Additionally, claims 13-16 are clearly obvious under 35 U.S.C. § 103(a) as they add nothing of patentable significance. Claim 13 recites “accessing the user environment and the second user environment using a browser”; claim 14 recites “communicating with the user environment using a TCP/IP communication protocol”; claim 15 recites “locating the user environment from a remote location using a URL address.” These claims are clearly obvious under § 103. TCP/IP was well-known as the standard Internet protocol suite used by the World Wide Web and other Internet applications, long before the application for the '761 patent was filed. See John December et al., *World Wide Web Unleashed* 330 (2d ed. 1995); Microsoft Dictionary at 462 (“It [TCP/IP] is built into the UNIX system and has become the de facto standard for data transmission over networks, including the Internet.”). Uniform Resource Locators (URLs) were also universally-known long before the '761 patent as the way of identifying resources on the World Wide Web. See J. December at 334; Microsoft Dictionary at 487. It goes without saying that browsers were likewise well-known before the '761 patent as a way to access the World Wide Web. See Microsoft Dictionary at 505. Accordingly, using a browser, TCP/IP and/or a URL address to access a user environment would have entailed a simple substitution of an World Wide Web-based environment in place of a non-Internet system (such as a proprietary (non TCP/IP) local area network), predictably resulting in a method in

which the user environment was accessed from via a browser through a URL address using the TCP/IP communications protocol. One of ordinary skill in the art would be clearly motivated to combine references in order to achieve the ability to access the user environment over the Internet using a web browser. As to dependent claim 16, it reads in its entirety: "The method of claim 9, further comprising accessing the user environment via a portable wireless device." Claim 16 is obvious over any of the anticipatory references identified above when combined with U.S. Patent No. 6,434,403 B1 to Michael R. Ausems et al. entitled "Personal Digital Assistant with Wireless Telephone." Ausems discloses a handheld wireless communications device that combines a personal digital assistant (PDA) and wireless telephone into a single portable device. *See* Ausems, Col. 1, ll. 5-9, 54-58. The portable wireless device in Ausems includes a CPU, runs the Microsoft Windows CE operating system, and includes a web browser in order to facilitate wireless Internet access. *See* Ausems, Col. 7, ln. 63-col. 8, ln. 4. Ausems further discloses that the device "may remotely communicate with a computer system." Ausems, Col. 9, ln. 17-18. Moreover, Hess CFS specifically discloses the use of a mobile handheld device to access a user environment. *See* Hess CFS, Abstract, §§ 3, 5, Fig. 3. Portable handheld wireless devices such as those disclosed in Ausems and Hess CFS were well-known long before the application for the '761 patent was filed. Using a portable wireless device to access a user environment would have entailed a simple substitution of a portable wireless device in place of a fixed-location or non-wireless device (such as a conventional desktop computer with a wired network connection), predictably resulting in a method in which the user environment was accessed from a portable wireless device. One of ordinary skill in the art would be motivated to combine to achieve the increased flexibility and mobility of being able to access a user environment from different locations. Claim 16 is therefore obvious under § 103.

Claim 31 similarly recites the non-patentable feature that “the storage component stores the data and the metadata according to at least one of a relational and an object storage methodology.” Such methodologies were well-known long before the application for the ’761 patent was filed. In fact, most if not all popular computer database products in existence at the time of the alleged invention of the ’761 patent (e.g., Oracle) were relational databases. See Microsoft Dictionary at 403-404 (“Microcomputer database products typically are relational databases.”). Using a relational methodology would have entailed a simple substitution of a relational database in place of a non-relational database, predictably resulting in a method in which the data and metadata were stored according to a relational methodology. One of ordinary skill in the art would be motivated to combine to achieve the increased flexibility and offered by widely-available relational database tools. Microsoft Dictionary, at 403.

Pursuant to Fed. R. Civ. P. 33(d), information regarding the lack of novelty and non-obviousness of the asserted claims of the ’761 patent is also located in (1) Parts IV, V and VI of the Request for *Ex Parte* Reexamination submitted to the U.S. Patent and Trademark Office on July 2, 2009, which has been served on LTI and is incorporated herein by reference, and (2) the prior art references cited above, which is being produced concurrently with this Response. Also pursuant to Rule 33(d), Facebook is producing today documents with Bates numbers FB00114078 to FB00119604.

Facebook reserves its right to supplement its response to this Interrogatory in accordance with Fed. R. Civ. P. 26(e).

Each prior art reference cited above not only individually anticipates each asserted claim of the ’761 patent under 35 U.S.C. 102, but also renders each asserted claim obvious when combined with any other cited reference. All of the references cited above relate generally to

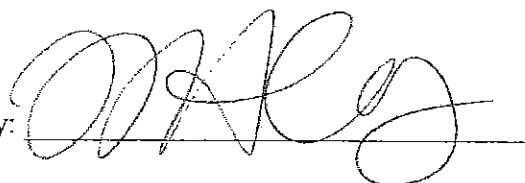
systems and methods for managing information across network environments. It would have been obvious to one of ordinary skill in the art to combine any of these references with any other reference to provide the systems and methods claims in the asserted claims. The motion to combine would come, for example, from the nature of the problem to be solved and the fact that the cited prior art references provide solutions to the same problems purportedly addressed in the '761 patent, which would lead a skilled artisan to look to those references for possible solutions to the problem. Moreover, all of the elements claimed in the '761 patent were well-known in the field and a person of ordinary skill in the art could easily combined the elements by known methods, with no change in their respective functions and yielding nothing more than results which would have been predictable at the time the '761 patent was filed.

Dated: November 2, 2009

OF COUNSEL:

Heidi L. Keefe (*pro hac vice*)  
Mark R. Weinstein (*pro hac vice*)  
Melissa H. Keyes (*pro hac vice*)  
**COOLEY GODWARD KRONISH LLP**  
3000 El Camino Real  
5 Palo Alto square, 4<sup>th</sup> floor  
Palo Alto, CA 94306

By:



Thomas P. Preston (DE Bar #2548)  
Steven L. Caponi (DE Bar #3484)  
**BLANK ROME LLP**  
12 N. Market Street  
Wilmington, DE 19801  
302-425-6400  
Fax: 302-425-6464

Attorneys for Defendant-Counterclaimant  
Facebook, Inc.

**CERTIFICATE OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF SANTA CLARA

I am employed in the County of Santa Clara, State of California. I am over the age of 18 and not a party to the within action. My business address is 3000 El Camino Real, Five Palo Alto Square, Palo Alto, CA 94306.

On November 2, 2009, I served the following documents:

**DEFENDANT FACEBOOK, INC.'S RESPONSES TO PLAINTIFF LEADER TECHNOLOGIES, INC.'S FOURTH SET OF INTERROGATORIES**

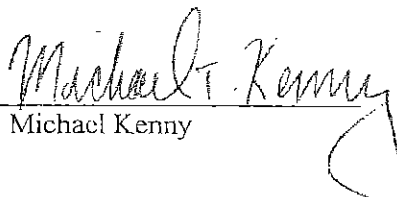
on the interested parties in this action by placing true and correct copies thereof enclosed in a sealed envelope addressed as follows (or as otherwise noted):

<u>BY PERSONAL SERVICE:</u>	<u>BY MAIL:</u>
Paul J. Andre, Esq. Lisa Kobialka, Esq. James Hannah, Esq. King & Spalding 333 Twin Dolphin Drive, Suite 400 Redwood Shores, CA 94065  pandre@kslaw.com lkobialka@kslaw.com jhannah@kslaw.com	Philip A. Rovner, Esq. Potter Anderson & Corroon LLP P.O. Box 951 Wilmington, DE 19899-0951  provner@potteranderson.com

**[XX] BY PERSONAL SERVICE:** I caused the above-mentioned document to be personally served on the offices of the addressee(s) as indicated above.

**[XX] BY MAIL:** I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Palo Alto, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the bar of this Court at whose directions the service was made. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 2, 2009 at Palo Alto, California.

  
Michael Kenny