

# EXHIBIT 14

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GOOGLE INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

ICONFIND, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 2:11-cv-00319-GEB-JFM

**JOINT STATEMENT RE DISCOVERY  
DISAGREEMENT - INFRINGEMENT  
CONTENTIONS**

Hearing Date: April 5, 2012

Time: 11:00 a.m.

8th Floor Courtroom 26

Before the Honorable Judge John F. Moulds

Pursuant to Local Rule 251, the Parties hereby submit to the Court a Joint Statement re Discovery Disagreement. The sufficiency of Plaintiff's infringement contentions remain in dispute and the Parties seek the Court's guidance on the disputed issue.

This statement was drafted jointly by the parties. The parties agreed to sections (a) and (b) below. However, on the day the statement was e-mailed to the Court, counsel for Plaintiff was given an opportunity to review Defendant's edits to Defendant's section of the statement (section (c)(i)). After waiting more than four hours without a response, Defendant filed the statement without a final confirmation from Plaintiff.

**(a) Details of the conference or conferences;**

In December of 2011, Defendant Google Inc. (“Google”) and Plaintiff IconFind, Inc. (“IconFind”) participated in a meet and confer concerning the sufficiency of IconFind’s infringement contentions. IconFind agreed to supplement its contentions and did so in January of 2012. On February 3, 2012, Google requested another meet and confer concerning the sufficiency of IconFind’s supplemental infringement contentions. Iconfind indicated that the parties had already met and conferred on the issues in December of 2011, that its position was that its infringement contentions were sufficient, and that it would not participate in another meet and confer on this topic.

**(b) Statement of the nature of the action and its factual disputes insofar as they are pertinent to the matters to be decided and the issues to be determined at the hearing;**

On February 3, 2011, IconFind filed this suit in the United States District Court for the Eastern District of California for infringement of United States Patent No. 7,181,459 B2 (the “’459 patent”). IconFind accused three products of infringing the ’459 patent: Google Books, Google Picasa and Google Knol. On May 9, 2011, the parties jointly submitted a schedule that required, in part, that IconFind provide initial infringement contentions on July 1, 2011. The infringement contentions were required to include “a chart identifying where each limitation of each asserted claim is found within the accused instrumentality.” The issue to be decided at the hearing is whether IconFind’s Supplemental Infringement Contentions satisfy this obligation.

**(c) Contentions of each party as to each contested issue, including a memorandum of each party's respective arguments concerning the issues in dispute and the legal authorities in support thereof.**

**(i) Defendant Google's Contentions**

On May 9, 2011, the parties agreed to a joint schedule that required the exchange of contentions. The contention exchange was based on the Northern District of California's Patent Local Rules and borrowed language from those Rules. On July 1, 2011, IconFind was required to provide "initial infringement contentions" containing, *inter alia*, "a chart identifying where each limitation of each asserted claim is found within the accused instrumentality." (Dkt. 47; N.D. Cal., Pat. L.R. 3-1(b)).

On July 1, 2011 IconFind produced infringement contentions that contained a chart that failed to identify the required information. IconFind's Second Supplemental Infringement Contentions are attached as Exhibit 1 to this Statement. The contention requirements in the Northern District's Patent Local Rules "exist to further the goal of full and timely discovery and to provide all parties with adequate notice and information with which to litigate their cases." *Avago Techs. General IP PTE Ltd. v. Elan Microelectronics Corp.*, No. 04-05385, 2007 WL 951818 at \*1 (N.D. Cal. Mar. 28, 2007).

Ninth Circuit courts consistently hold that infringement contentions that simply recite claim language and point to an accused product are insufficient because they do not provide adequate notice. A plaintiff must provide a "link" between the claim language and the product in order to satisfy its obligations. *See, e.g., Network Caching Tech., LLC v. Novell, Inc.*, No. 01-2079, 2002 WL 32126128, at \*5 (N.D. Cal. 2002) (finding plaintiff's infringement contentions insufficient because the plaintiff provided "no link between the quoted passages [from defendant's documents] and the infringement contention that simply mimics the language of the claim...In essence, [plaintiff] has provided no further information to defendants than the claim

language itself”); *Diagnostic Sys. Corp. v. Symantec Corp.*, No. 06-1211, 2009 WL 1607717, at \*4 (C.D. Cal. June 5, 2009) (finding plaintiff’s infringement contentions “unacceptable” for, *inter alia*, “fail[ing] to identify and describe, in a clear and consistent manner, what, if any, of [defendant’s products] constitute [certain claim elements]”).

Without adequate infringement contentions, Google is at a disadvantage in preparing its defense. *See Diagnostic Sys. Corp.* 2009 WL 1607717, at \*4 (finding that plaintiff’s infringement contentions were unacceptable and holding that “[t]o the extent defendants are given vague infringement contentions, they are hampered in their ability to prepare their defense”) (internal citation omitted).

Plaintiff’s infringement contentions are insufficient on two separate claim elements, each will be discussed below.

#### a) Plaintiff Has Failed To Identify The Network Page

All three independent claims in the ’459 patent claim “a method for categorizing a *network page*.” (Emphasis added). A year after filing its infringement case, Plaintiff has yet to identify the *network page* that it alleges Google is categorizing in violation of Plaintiff’s patent rights. Plaintiff fails to identify the *network page* with the preamble of claim 1 as shown in the exemplary page below:

## U.S. Patent No. 7,181,459 - Claim 1

Claim 1.

1. A computer implemented method of categorizing a network page, comprising:

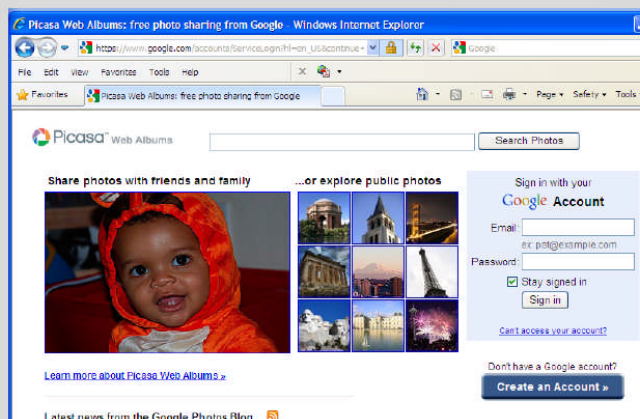
providing a list of categories, wherein said list of categories include a category for transacting business and a category for providing information, and wherein said list of categories include a category based on copyright status of material on a page;

assigning said network page to one or more of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

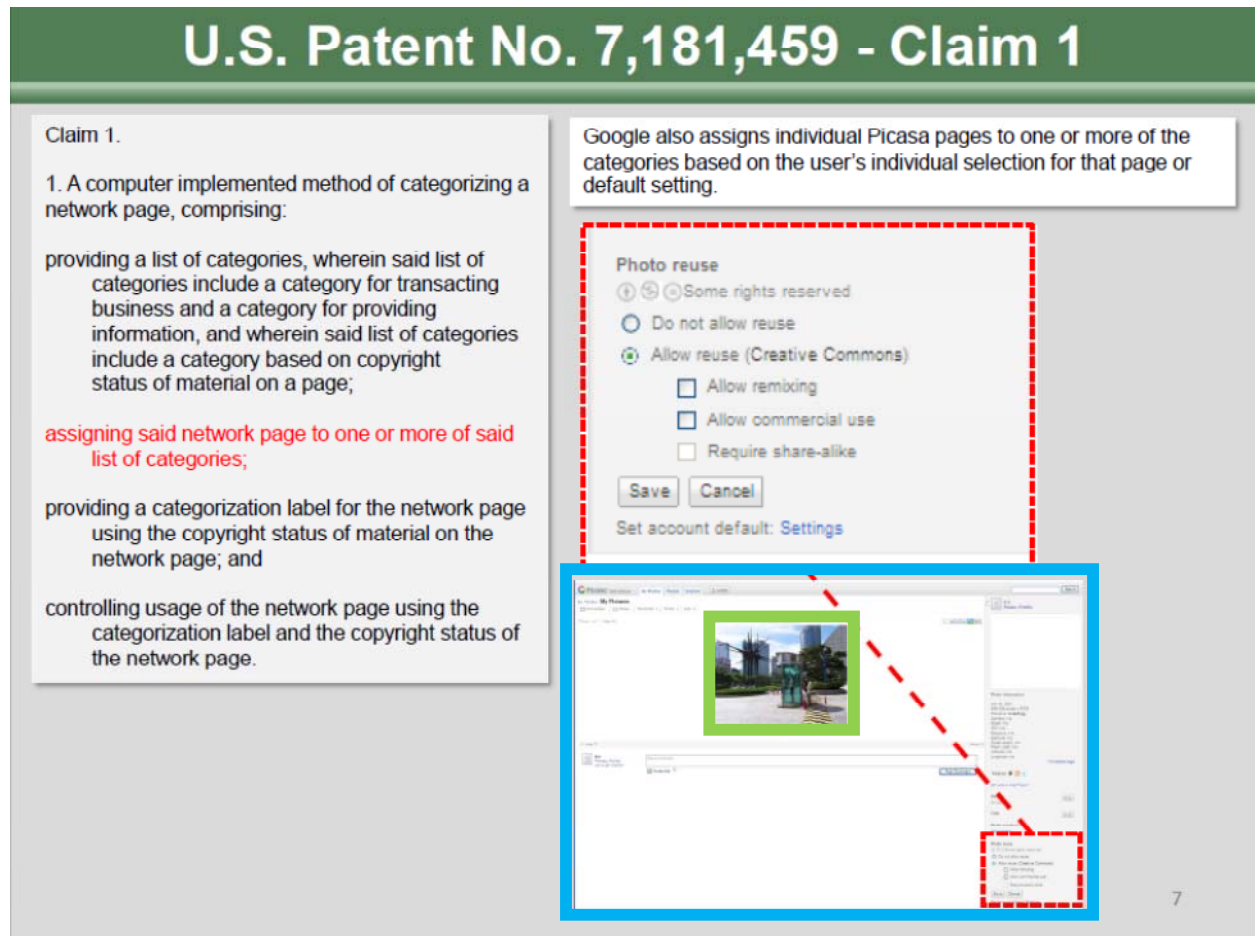
controlling usage of the network page using the categorization label and the copyright status of the network page.

Google Inc.’s Picasa is an online resource that allows users to share and add content, including photos. By and through its Picasa website, Google categorizes pages on the Internet that contain its users’ content, including photos.



Plaintiff's Second Supplemental Infringement Contentions, Ex. 1, p. 77.

Plaintiff also fails to identify the *network page* in the “assigning” element as shown in the exemplary page below:



Plaintiff’s Second Supplemental Infringement Contentions, Ex. 1, p. 79 (blue and green highlighting added).

Plaintiff is required to identify “where each limitation of each asserted claim is found within the accused instrumentality.” (Dkt. 47, ¶ 5.c.) A recitation of claim language alongside an accused product without an identification of how the product meets the claims is insufficient as a matter of law. *See Network Caching Tech.*, 2002 WL 32126128, at \*5. On the page cited above, Plaintiff literally recites the claim language but simply replaces “network page” with “individual Picasa page.” Plaintiff offers no definition for the term “individual Picasa page” and

does not highlight or otherwise identify the “network page” that is allegedly assigned to the list of categories. Plaintiff identified the “one or more of said list of categories” element (in red), but leaves Google to guess what part of Picasa allegedly satisfies the “network page” element.

One might be tempted to assume that Plaintiff contends that the page highlighted in blue is the “network page.” However, the litigation history of the ’459 patent and the testimony of the ’459 patent’s inventors suggest that Plaintiff contends that the image on the page, highlighted in green, is the “network page.” The next page of IconFind’s infringement contentions are similarly vague:

**U.S. Patent No. 7,181,459 - Claim 1**

**Claim 1.**

1. A computer implemented method of categorizing a network page, comprising:

- providing a list of categories, wherein said list of categories include a category for transacting business and a category for providing information, and wherein said list of categories include a category based on copyright status of material on a page;
- assigning said network page to one or more of said list of categories;
- providing a categorization label for the network page using the copyright status of material on the network page; and
- controlling usage of the network page using the categorization label and the copyright status of the network page.

Google's internal documents confirm that it assigns individual Picasa pages to one or more of the categories based on the user's individual selection for that page or default setting.

**Photos Data API - Codesite extensions**

**Creative Commons**

Picasa Web supports Creative Commons licensing for photos by specifying a default license type that applies to every photo in their online gallery and by setting specific licenses for individual photos. The license info is available in the Data API as a separate element under the "gphoto" namespace.

**REDACTED**

RESTRICTED CONFIDENTIAL - SOURCE CODE - PROSECUTION BAR MATERIAL 0000-REVIEW 8

Plaintiff’s Second Supplemental Infringement Contentions, Ex. 1, p.82.



Plaintiff again states that “individual Picasa pages” are assigned but fails to identify or otherwise define what an “individual Picasa page” is. The term is not used in the cited document or otherwise defined in Plaintiff’s infringement contentions.

IconFind’s infringement contentions are similarly vague in identifying the “network page” element with regard to other accused products:

**U.S. Patent No. 7,181,459 - Claim 1**

**Claim 1.**

1. A computer implemented method of categorizing a network page, comprising:

providing a list of categories, wherein said list of categories include a category for transacting business and a category for providing information, and wherein said list of categories include a category based on copyright status of material on a page;

assigning said network page to one or more of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

controlling usage of the network page using the categorization label and the copyright status of the network page.

Google assigns the Google books pages to one or more of the categories based on the user's settings. As shown below, on a Google books page, the license is "displayed alongside your book," and thus is a "Creative Commons license to your book in Google Books."

**Using a Creative Commons license with your books**

If you have included your books in the Google Books Partner Program, you can now attribute a Creative Commons license to your titles, and have this license displayed alongside your book.

With a Creative Commons license, you can keep your copyright but allow people to copy and distribute your work provided they give you credit — and only on the conditions you specify.

**Frequently Asked Questions**

A few of the most common questions about attributing a Creative Commons license to your book in Google Books are below. For further information, please see the [Creative Commons FAQ](#) site.

**Are there required settings before I can apply a Creative Commons license to my book?**  
Yes. In order to participate, you will need to provide the worldwide rights for your books. In addition, you must show your books 100% browsable to users, with downloading enabled. You can read more about enabling download [here](#).

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Plaintiff’s Second Supplemental Infringement Contentions, Ex. 1, p. 52.

With respect to Google Books, Plaintiff states that “Google assigns the Google books pages” to the list of categories, but does not identify a “Google books page” or otherwise define the term. Google is again left to guess what Plaintiff contends meets the “network page” element.

Because Plaintiff's infringement contentions fail to put Google on notice of the claims against it with respect to this claim element, Google respectfully requests that this Court compel Plaintiff to identify the "network page" that Google allegedly categorizes with enough specificity for Google to prepare an adequate defense.

### b) Plaintiff Failed To Identify The Copyright Status Categories

Dependent claim 6 and independent claim 31 recite a limitation that requires an accused method to provide "categories related to public domain, fair use only, use with attribution, and permission of copyright owner needed." Plaintiff has failed to identify where that limitation is allegedly met in Google's accused products. The page below is exemplary of Plaintiff's contentions on this claim limitation:

## U.S. Patent No. 7,181,459 - Claim 31

**Claim 31.**

A computer implemented method of categorizing a network page, comprising:

providing a list of categories, wherein said categories include a category based on the copyright status of material on a page, and wherein the copyright status comprises categories related to public domain, fair use only, use with attribution, and permission of copyright owner needed;

assigning said network page to one or more of a plurality of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

controlling usage of the network page using the categorization label and the copyright status of the network page.

Google incorporates into its Picasa website the use of Creative Commons licenses. Google provides a list of categories for Picasa, as shown below, including a variety of copyright status options "related to public domain, fair use only, use with attribution, and permission of copyright owner needed." For example, "do not allow reuse (all rights reserved)" is a category related to "permission of copyright owner needed."

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☐ Do not allow reuse (All rights reserved)  
☒ Allow reuse with attribution  
☐ Allow remixing  
☐ Require Share-Alike  
☐ Allow commercial use

License name: Attribution Non-Commercial No Derivatives

1 Plaintiff's Second Supplemental Infringement Contentions, Ex. 1, p. 108.

2 Again, Plaintiff simply recites the claim language and points to an accused product  
3 without providing the required link between the claim language and the product. The claim  
4 element recites four limitations: "categories related to [1] public domain, [2] fair use only, [3]  
5 use with attribution, and [4] permission of copyright owner needed." Plaintiff identified where  
6 the fourth limitation is found in the accused product while completely ignoring the first three.  
7 This contention does not identify "where each limitation of each asserted claim is found within  
8 the accused instrumentality" so it is insufficient. (Dkt. 46, ¶ 5.c.) Google is left to guess which  
9 licenses, if any, allegedly meet the other three limitations recited in the claim element.

10 In its section of this statement, Plaintiff contends that this claim element can be met by  
11 only one category in the accused product. Currently, it's infringement contentions only indicate  
12 that the "do not allow reuse (all rights reserved)" category is related to the "permission of  
13 copyright owner needed" limitation. Further, that contention is labeled as an "example." If  
14 Plaintiff's contention is that the "do not allow reuse (all rights reserved)" category in the accused  
15 product meets this entire claim element, then it should be required to say so.

16 Because Plaintiff's infringement contentions fail to put Google on notice of the claims  
17 against it with respect to this claim element, Google respectfully requests this Court to compel  
18 Plaintiff to identify the licenses that are allegedly related to the copyright statuses listed in the  
19 claim element with sufficient specificity in order to allow Google to prepare its defense.

20 **(ii) Plaintiff IconFind's Contentions**

21 IconFind's Second Supplemental Infringement Contentions, which contain 110 pages of  
22 claim charts for every claim asserted in this litigation (Ex. 1), are more than sufficient under the  
23 Local Patent Rules. Google's arguments simply reflect the disagreements of the Parties  
24 concerning the scope and meaning of certain claim terms and the application of those disputed

1 terms to the products accused of infringement (the “Accused Google Instrumentalities”).  
2 Google’s briefing is, in effect, a preview of the Parties’ disputes positions on claim construction  
3 in this case, which will be decided by this Court in short order. A claim construction schedule  
4 has been set; the parties recently exchanged on March 28, 2012 their proposed constructions of  
5 the disputed claim terms and briefing is currently schedule to begin on June 12, 2012. (Dkt. No.  
6 55).

7 Tellingly, the three claim elements that Google asserts are deficient in this case (“network  
8 page”, the “assigning” step and the copyright status categories) are all included in Google  
9 proposed list of terms to be construed. (Ex. 2). If Google believes that these terms need to be  
10 defined by the Court, then how can it complain that IconFind has failed to adequately identify  
11 these terms in its Supplemental Infringement Contentions?

12 IconFind’s Supplemental Infringement Contentions at this time reflect its proposed  
13 construction of the terms as applied to the Accused Google Instrumentalities. Google, as  
14 expected, disagrees. There is no basis for Google’s motion to compel and Google’s request  
15 should be denied.

16 **A. Google Misses the Mark on the “Copyright Status” Categories Element and**  
17 **Mistakenly Asserts that Each of the Four Copyright Elements Must Be Present**  
**to Infringe**

18 Google’s analysis refers to the copyright claim elements in a vacuum and mistakenly  
19 suggests to the Court that the claim language requires four separate and distinct categories in the  
20 Accused Products. This is not the case. This element as it appears in Claim 31, the claim  
21 Google utilizes above by way of example, reads:

22 Providing a list of categories, wherein said categories include **a category** based on the copyright  
23 status of the material on a page, and wherein the copyright status comprises categories **related to**  
24 public domain, fair use only, use with attribution, and permission of the copyright owner needed.

1 As noted in bold above, Google ignores to phrases “a category” and “related to.” This is  
2 important for three reasons. First, there need not be an exact “match up” to a category; the use of  
3 the phrase “related to” means just that: “related to” the following four copyright categories.  
4 Second, these categories are not mutually exclusive: they can occur at the same time. For  
5 example, a category can be related both to public domain and fair use only. Third, one or all four  
6 of them could be present in order to infringe: all four categories need not be present in the  
7 Accused Product to infringe this claim term. Specifically, the claim language requires only “a  
8 category” based on the copyright status. Thus, all that needs to be present are one or more  
9 categories that are related to either (1) public domain; (2) fair use only; (3) use with attribution;  
10 or (4) permission of the copyright owner.

11 With these points of clarification in mind, IconFind’s Supplemental Contentions are more  
12 than sufficient to put Google on notice of its claims of infringement. As shown below, IconFind  
13 provided to Google an example of where the category is related to “permission of the copyright  
14 owner needed”:  
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# U.S. Patent No. 7,181,459 - Claim 31

## Claim 31.

A computer implemented method of categorizing a network page, comprising:

providing a list of categories, wherein said categories include a category based on the copyright status of material on a page, and wherein the copyright status comprises categories related to public domain, fair use only, use with attribution, and permission of copyright owner needed;

assigning said network page to one or more of a plurality of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

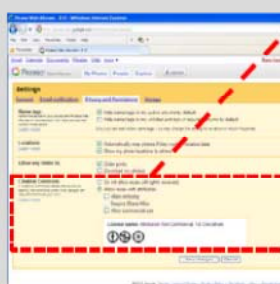
controlling usage of the network page using the categorization label and the copyright status of the network page.

Google incorporates into its Picasa website the use of Creative Commons licenses. Google provides a list of categories for Picasa, as shown below, including a variety of copyright status options "related to public domain, fair use only, use with attribution, and permission of copyright owner needed." For example, "do not allow reuse (all rights reserved)" is a category related to "permission of copyright owner needed."

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☐ Do not allow reuse (All rights reserved)  
☒ Allow reuse with attribution  
☐ Allow remixing  
☐ Require Share-Alike  
☐ Allow commercial use

License name: Attribution Non-Commercial No Derivatives



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The fact that Google disagrees with that construction is of no relevance to the sufficiency of IconFind's contentions. This contention is more than sufficient.

## B. IconFind Has Sufficiently Identified the Network Page Element

Again, the Parties disagree as to the proper construction of the term "network page." (See Google and IconFind's Proposed Constructions of this term, Ex. 2 and Ex. 3). As set forth in IconFind's proposed construction and as exemplified in IconFind's Supplemental Infringement Contentions, a "network page" in the context of the '459 Patent is just that: a page on the Internet, private corporate network, intranet, local area network or other network. (Ex. 3). Google asserts that IconFind must be more specific in its Supplemental Infringement Contentions. This is incorrect. IconFind's infringement contentions reflect its proposed construction of the term "network page." IconFind's contentions are consistent with this



construction. As set forth in the example below, Google categorizes “network pages” or, “pages on the internet that contain its users’ content, including photos”:

U.S. Patent No. 7,181,459 - Claim 1

Claim 1.

1. A computer implemented method of categorizing a network page, comprising:

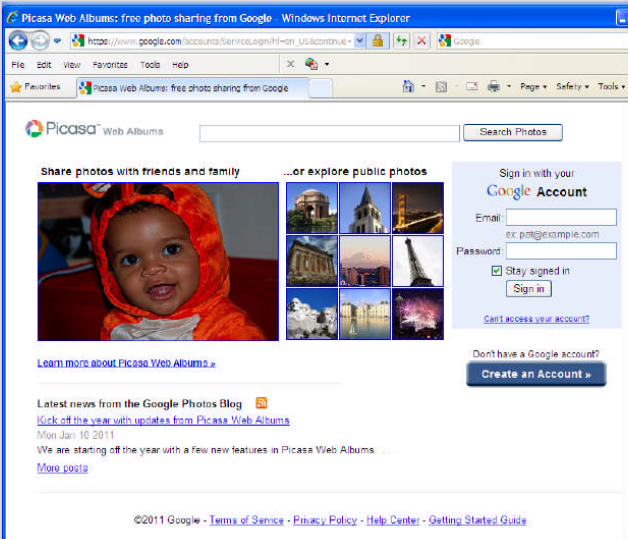
providing a list of categories, wherein said list of categories include a category for transacting business and a category for providing information, and wherein said list of categories include a category based on copyright status of material on a page;

assigning said network page to one or more of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

controlling usage of the network page using the categorization label and the copyright status of the network page.

Google Inc.'s Picasa is an online resource that allows users to share and add content, including photos. By and through its Picasa website, Google categorizes pages on the Internet that contain its users' content, including photos.



The fact that Google disagrees with those contentions (and the underlying construction supporting that contention) is of no relevance to the sufficiency of IconFind's contentions. The parties disagree as to the precise meaning of this claim term. IconFind's contentions as to this claim element are more than sufficient.

### C. The Assigning Step is Appropriately Identified

As with the element “network page,” the same analysis applies to the “assigning step.” Google also asserts that this claim term should be construed. (Ex. 2). IconFind asserts that assigning means just that “assigning.” (Ex. 3). And as set forth in IconFind's Supplemental Infringement Contentions, Google “assigns” the Google books' network pages to one of more categories:

# U.S. Patent No. 7,181,459 - Claim 1

## Claim 1.

1. A computer implemented method of categorizing a network page, comprising:

providing a list of categories, wherein said list of categories include a category for transacting business and a category for providing information, and wherein said list of categories include a category based on copyright status of material on a page;

assigning said network page to one or more of said list of categories;

providing a categorization label for the network page using the copyright status of material on the network page; and

controlling usage of the network page using the categorization label and the copyright status of the network page.

Google assigns the Google books pages to one or more of the categories based on the user's settings. As shown below, on a Google books page, the license is "displayed alongside your book," and thus is a "Creative Commons license to your book in Google Books."

### Using a Creative Commons license with your books

If you have included your books in the Google Books Partner Program, you can now attribute a Creative Commons license to your titles, and have this license displayed alongside your book.

With a Creative Commons license, you can keep your copyright but allow people to copy and distribute your work provided they give you credit — and only on the conditions you specify.

#### Frequently Asked Questions

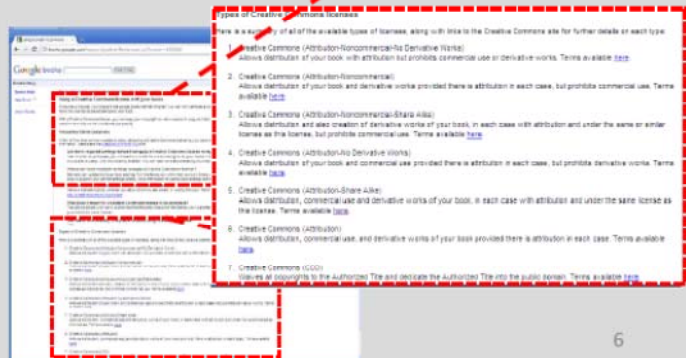
A few of the most common questions about attributing a Creative Commons license to your book in Google Books are below. For further information, please see the [Creative Commons FAQ](#) site.

#### Are there required settings before I can apply a Creative Commons license to my book?

Yes. In order to participate, you will need to provide the worldwide rights for your books. In addition, you must show your books 100% browsable to users, with downloading enabled. You can read more about enabling download [here](#).

#### Where can I edit my book settings to apply a Creative Commons license?

Partners can update individual book settings from the Books tab within their account. Simply click on the pencil icon (✎) alongside the book in question and edit the settings directly. More information on editing book settings can be found [here](#).



IconFind need not explain or add anything further to this contention. Its position is clearly articulated. Google's contention that it does not understand what the word "assigning" means in the context of the '459 Patent does not go to the **sufficiency** of IconFind's contentions. It goes to the substantive issue of Google's infringement as informed by the claim construction process. Google is free to argue that position in its proper context: the claim construction process that is set to begin in less than two months.

In sum, Google's current attack on IconFind's Supplemental Infringement Contentions simply stems from the Parties' disagreement: (a) as to the meaning of these claims terms; and (2) the application of these disputed claim terms to the Accused Instrumentalities. IconFind should not be compelled to alter or modify its contentions, which are consistent with the claim



1 construction positions it has taken, simply because Google disagrees with them. As such,  
2 IconFind respectfully requests that this Court deny Google's motion to compel.

3  
4 Respectfully submitted,

5 /s/ Kenneth M. Maikish

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 29, 2012 the foregoing

**JOINT STATEMENT RE DISCOVERY DISAGREEMENT - INFRINGEMENT  
CONTENTIONS**

was filed with the Clerk of Court via e-mail and sent to the following counsel of record.

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