

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION**APRIL 11, 2007****U.S. PATENT NO. 7,024,381 B1****EXHIBIT D****CLASSIFICATIONS, COMBINATIONS AND MOTIVATIONS****(Part 1)**

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
1.	<i>Yoshida</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting electronic hardware and software technologies and functional features of computer implemented video rental kiosk machines to improve item rental business
2.	<i>Kuriyama</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting electronic hardware and software technologies and functional features of computer implemented video rental kiosk machines to improve item rental business

¹ A reference classified under 35 U.S.C. § 102 is one which Blockbuster contends to anticipate one or more claims of United States Patent No. 7,024,381 B1; and/or a reference classified under 35 U.S.C. § 103 is one which Blockbuster contends to render one or more claims of said patent obvious.

² See also the motivations listed in Exhibits E and F.

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
3.	<i>Koya</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting electronic hardware and software technologies and functional features of computer implemented video rental kiosk machines to improve item rental business
4.	<i>Crooks</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting electronic hardware and software technologies and functional features of computer implemented video rental kiosk machines to improve item rental business
5.	<i>Isobe</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting electronic hardware and software technologies and functional features of computer implemented video rental kiosk machines to improve item rental business
6.	<i>Bradley</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting video content storage, distribution and selection technologies used in TV broadcast systems to improve item rental business
7.	<i>Morales</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting digital electronic telecommunication technologies for conducting e-commerce on the Internet to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
8.	<i>NCR</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting computer implemented method for ordering and downloading resources/contents based on searching their digital profiles/attributes over a telecommunication network to improve item rental business
9.	<i>Saigh</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting digital electronic telecommunication technologies for conducting e-commerce on the Internet to improve item rental business
10.	<i>Hendricks</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting digital electronic telecommunication technologies for conducting e-commerce on the Internet to improve item rental business
11.	<i>Cook</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting computer hardware systems and software program technologies with user friendly features for allowing a user to make and update a list of desired and/or reserved items to improve item rental business
12.	<i>Ginter</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting digital electronic telecommunication technologies for conducting e-commerce on the Internet to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
13.	<i>Fein</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting video content storage, distribution and selection technologies used in TV broadcast systems to improve item rental business
14.	<i>Leason</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting computer hardware systems and software program technologies with user friendly features for allowing a user to make and update a list of desired and/or reserved items to improve item rental business
15.	<i>Reference Guide</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting library practices with computer implemented subscription based no late fee book-lending programs to improve item rental business
16.	<i>Functional Requirements</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting library practices with computer implemented subscription based no late fee book-lending programs to improve item rental business
17.	<i>Maxcess</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting library practices with computer implemented subscription based no late fee book-lending programs to improve item rental business
18.	<i>Sirsi</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting library practices with computer implemented subscription based no late fee book-lending programs to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
19.	<i>Auto Librarian</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting library practices with computer implemented subscription based no late fee book-lending programs to improve item rental business
20.	<i>Multi-Video</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting brick and mortar video store rental practice with subscription based no late fee charge programs to improve item rental business
21.	<i>Pop*Card</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting brick and mortar video store rental practice with subscription based no late fee charge programs to improve item rental business
22.	<i>Video Hit</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting brick and mortar video store rental practice with subscription based no late fee charge programs to improve item rental business
23.	<i>Cine Club</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting brick and mortar video store rental practice with subscription based no late fee charge programs to improve item rental business
24.	<i>Campus Video</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting brick and mortar video store rental practice with subscription based no late fee charge programs to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
25.	<i>AudioQueue</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
26.	<i>BTCC</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
27.	<i>BTL Web Pages</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
28.	<i>BTL Services</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
29.	<i>BTL</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
30.	<i>BVS publications</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio and video program rental business to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
31.	<i>BVS services</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio and video program rental business to improve item rental business
32.	<i>BVS</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio and video program rental business to improve item rental business
33.	<i>TBW</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
34.	<i>Books On Tape publications</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
35.	<i>Books On Tape services</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business
36.	<i>BOT</i>	35 U.S.C. § 102/ 35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting subscription based no late fee practices utilized in audio book and tape rental business to improve item rental business

BLOCKBUSTER'S FINAL INVALIDITY CONTENTION
(U.S. PATENT NO. 7,024,381 B1)

	Short Name	Classification¹	In Combination with	Motivation for Combination or Modification²
37.	<i>Video Vendor</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting computer hardware systems and software program technologies with user friendly features for allowing a user to make and update a list of desired and/or reserved items to improve item rental business
38.	<i>Avis</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting telecommunication systems and computer software technologies for conducting online car rental business to improve item rental business
39.	<i>TiVo</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting video content storage, distribution and selection technologies used in TV broadcast systems to improve item rental business
40.	<i>Netflix</i>	35 U.S.C. § 103	By itself or in combination with any one or more of the references cited herein	Adopting Netflix prior per-item online DVD rental business to improve item rental business
41.	Any combination of references cited above	35 U.S.C. § 103	Any combination of references cited above	Improving item rental business