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November 10, 2009

BY E-FILE AND HAND DELIVERY | **PUBLIC VERSION**

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
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:

Facebook's motion to strike three claims from Leader's infringement contentions supplemented before the close of "paper" discovery, before the commencement of depositions, and before expert discovery, should be denied. The Scheduling Order in this case expressly provides that the last day to provide information on all contention interrogatories is November 20, 2009. D.I. 76. This Court confirmed this deadline in its September 4, 2009 Order, noting that the "Scheduling Order entered by Judge Farnan expressly provides: 'Exchange and completion of contention interrogatories, identification of fact witnesses and document production [i.e., 'paper discovery'] shall be commenced so as to be completed by November 20, 2009.'" D.I. 111 at 1-2.

Facebook clearly will not suffer any prejudice. It was Facebook that demanded that Leader supplement its infringement contentions. Since October 15, 2009, Facebook insisted that Leader supplement its infringement contentions at least two times, which Leader agreed to do. Facebook has also argued time and time again that this case is far from over and that discovery is still in its very early stages. Recently Facebook stated "a great deal of work remains to be done in this case...." See D.I. 131 at 10. In fact, Facebook is presently moving the Court to amend its counterclaims to *add* a new claim to the case, a counterclaim of false marking. See D.I. 128 ("...though discovery is not set to close until March 2010"). Moreover, nothing has prevented Facebook from substantially supplementing its own contention responses on validity issues. Indeed, in just the last week, Facebook supplemented its own invalidity contentions *twice*. Exs. F-G (Invalidity Contentions).

Facebook is attempting to find any way it can to use its feigned dissatisfaction with Leader's infringement contentions as grounds to delay the upcoming trial date. Facebook's motion flies in the face of the Scheduling Order in this case; its inconsistent positions and lack of case law support independently warrant denial of its motion.

Background

Facebook filed an *ex parte* reexamination request of the '761 Patent in July of 2009, which was signed by Facebook's lead trial counsel in this case. The request sought reexamination of both asserted and unasserted claims of the '761 Patent as of that date. Specifically, unasserted Claims 6, 22, 27, 28 and 35 were part of Facebook's reexamination

request. Ex. I. Thus, it appears that Facebook has been searching for prior art related to *all* the claims of the '761 Patent.

On October 15, 2009, Leader served detailed supplemental infringement contentions to Facebook in accordance with the Court's September 4, 2009 Order. ██████████████████ ███ On October 16, 2009, Facebook insisted that Leader supplement its infringement contentions, dictating that Leader present its supplemental contentions in a specific format, claiming that Leader's format was not precise enough. Ex. A. While Leader believed its infringement contentions were sufficient, it wanted to avoid unnecessary motion practice and agreed to supplement. Ex. A. On October 23, 2009, Facebook represented to the Court that it had produced all relevant technical documents, despite Leader's concerns that key documentation was missing from Facebook's productions of technical documents on September 29 and October 1, 2009.

Based on Facebook's demands and representation that no further technical documentation existed, Leader undertook the process of preparing another set of supplemental infringement contentions. Ex. K. It found that the Facebook Website absolutely infringed three additional claims of the '761 Patent, including one independent claim, Claim 17, and two dependent claims, Claims 3 and 6. Leader included these three claims in its October 28, 2009 supplementation. Ex. H (Leader Infringement Contentions). Notably, Claim 6 is undergoing reexamination.

After Leader supplemented its supplemental infringement contentions, Leader and Facebook met and conferred numerous times. Exs. A-E. During a November 4 meet and confer, Facebook could not specify which part of the Scheduling Order or the Court's September 4, 2009 Order prohibited Leader from supplementing its contention interrogatory responses. Ex. E.

The Deadline for Contention Interrogatory Responses is November 20, 2009

The Scheduling Order requires the exchange and completion of contention interrogatories to be completed by November 20, 2009. D.I. 76. This deadline was confirmed in this Court's September 4, 2009 Order. D.I. 111 at 1-2. Leader's supplemental infringement contentions were served on Facebook almost a month before this deadline. Thus, Facebook's argument that October 15, 2009 is the deadline for final contention interrogatories seems to be an attempt to modify the existing Scheduling Order. As such, Facebook's request should be denied.

Furthermore, Facebook insisted that Leader supplement its infringement contentions after October 15, 2009. Thus, Facebook's position that Leader cannot submit infringement contentions after October 15, 2009 is contrary to the very demands it previously made to Leader.

Facebook Will Not Suffer Any Prejudice

There can be no question that Facebook has been searching for prior art against all the claims of the '761 Patent. It filed an *ex parte* reexamination request in July that included a number of claims that were not asserted in the litigation at that time. ██████████████████ ████████████████████████████ It is highly improbable that Facebook, since filing its invalidity counterclaims in January of this year, has limited its prior art search to just the claims asserted in "paper" discovery. Undermining Facebook's motion is the fact that Facebook has known for quite some time that the last day for contention interrogatory responses is November 20, 2009 and that, in Facebook's own words, "this action is far from complete," as "a great deal of work remains to be done in this case" because, *inter alia*, no depositions have been taken. D.I. 131 at 10.

Facebook made the following representation to the Court less than three weeks ago:

"This case has been pending for less than one year. Discovery is still open, no deposition have been taken, expert discovery has yet to start, no summary judgment motions have been filed, claim construction has neither been brief nor argued, and trial is not schedule until June of next year."

D.I. 131 at 10. It is disingenuous for Facebook to now claim the case is at a "late stage" in order to conjure up claims of prejudice. Ex. A.

Furthermore, Facebook's argument that it is untimely to supplement contention interrogatories flies in the face of its own actions. On November 2, 2009, Facebook disclosed 35 alleged prior art references. On November 3, 2009, Facebook disclosed for the first time an additional 19 new alleged prior art references. Those disclosures were in response to an interrogatory seeking information regarding its invalidity counterclaim, which was previously requested in February in connection with Interrogatory No. 4.[1] Ultimately, Facebook has increased the number of alleged references it intends to use in this litigation in the last week from 15 to 64 references. Clearly, it has done so, based on its belief that it is appropriate to continue to supplement the contentions until November 20, 2009.

Rule 26(e) Requires Leader to Supplement its Infringement Contentions

Leader's supplementation is in compliance with its discovery obligations under Federal Rule of Civil Procedure Rule 26(e)(1)(A). Once Facebook demanded further supplementation and represented that it has produced all technical documents, Leader reviewed all the information that had been provided and supplemented its contentions, including claim charts, in compliance with Rule 26(e). Ex. H (Leader Infringement Contentions). Contrary to Facebook's claims, Leader's timely supplementation was not motivated by Facebook's motion to stay, filed on October 21, 2009. Rather, it was in response to Facebook's demands to supplement and representations about its production. Undermining Facebook's present allegations is the fact that Leader asserted Claim 6, a claim it knew was currently undergoing reexamination. Leader sought only to be complete with its supplementation. Rule 26(e) requires Leader to supplement its infringement contentions, regardless of whether or not the new claims were ever asserted in the reexamination. It appears that Facebook's dispute is with the PTO for not granting reexamination of all claims, not with Leader or the Court.

Respectfully,

/s/ Philip A. Rovner

Philip A. Rovner (#3215)
provner@potteranderson.com

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[1] For discussion on the timing of Facebook's disclosure of alleged prior art references in this case, Leader refers the Court to its Opposition to Facebook's Motion To Stay. D.I. 148 at 5, 8-10.

The Honorable Leonard P. Stark
November 10, 2009
Page 4

PAR /mes/941681
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

Public Version: November 18, 2009

EXHIBIT A

From: Norberg, Jeffrey [jnorberg@cooley.com]

Sent: Thursday, October 29, 2009 1:55 PM

To: Hannah, James

Cc: 'Rovner, Philip A.'; Kobialka, Lisa; Andre, Paul; 'Caponi, Steven L.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa

Subject: RE: Leader v. Facebook

James,

In addition to the issues below, Facebook notes that the claim chart included with last night's supplemental interrogatory responses included several new claims that have never before been asserted in this litigation. LTI offers no justification for its addition of these new claims at this late stage of the case, and weeks after the Court's October 15 deadline to provide supplemental interrogatory responses. Please confirm by the end of the day today that LTI will remove these improperly added claims or Facebook will ask the Court to strike these supplemental contentions pursuant to Rule 37.

Sincerely,

Jeff

From: Norberg, Jeffrey
Sent: Wednesday, October 28, 2009 6:47 PM
To: 'Hannah, James'
Cc: 'Rovner, Philip A.'; 'Kobialka, Lisa'; 'Andre, Paul'; 'Caponi, Steven L.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa
Subject: RE: Leader v. Facebook

James,

LTI's supplemental responses to Facebook's Interrogatory Nos. 1 and 12-17, received this evening, do not address any of the issues carefully detailed in my October 16 letter. As with the improper responses addressed by the Court last week regarding LTI's theory of willful infringement, LTI's supplemental responses still include improper qualifying language indicating that LTI has not fully disclosed its contentions. LTI's supplemental response to Interrogatory No. 1 cites hundreds of php files without charting any accused functionality on a limitation-by-limitation basis. Moreover, the chart included in response to Interrogatory No. 1 includes numerous statements that the charted functionality is provided "by way of example and not limitation . . ." Finally, all of LTI's supplemental responses include a qualifying statement that "one of skill in the art would recognize that the order of the steps presented above merely provides a non-limiting example to illustrate the infringing functionality implemented by the source code modules." None of these qualifiers or "placeholders" are appropriate at this stage of the litigation after LTI has had ample opportunity to review and study Facebook's source code with your expert.

The September 4 Order required LTI to provide no later than October 15 supplemental infringement contentions based on LTI's review of Facebook's source code and technical documents. It is now two weeks beyond October 15 and LTI has still failed to comply. Just as Facebook was entitled to complete and unqualified responses to Facebook's interrogatories regarding willfulness, Facebook is entitled to complete and unqualified responses to its interrogatories regarding LTI's infringement contentions. Unless LTI agrees to provide unqualified responses by the close of business tomorrow, Facebook will contact the Court to arrange for a discovery hearing to make certain that LTI is limited to the response in its chart, and that all qualifying language is removed.

Sincerely,

Jeff

_____

From: Norberg, Jeffrey
Sent: Tuesday, October 27, 2009 5:40 PM
To: 'Hannah, James'
Cc: Rovner, Philip A.; Kobialka, Lisa; Andre, Paul; Caponi, Steven L.; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa
Subject: RE: Leader v. Facebook

James,

Thank you for your agreement to supplement by tomorrow Leader's responses to Facebook's Interrogatory Nos. 1 and 12-17. We expect that Leader's supplemental responses will resolve the issues identified in my October 16 letter. To the extent any issues remain unresolved after receipt of tomorrow's supplement, we intend to contact the Court on Friday morning to schedule a discovery hearing.

We note that Leader has failed to respond to my e-mail last Friday requesting information sufficient to support Leader's assertion of privilege regarding LTI078262-64. As stated in my e-mail, this document is not privileged. It is an e-mail between Mr. McKibben and a non-lawyer third-party. Our review of Leader's privilege log leads us to believe that Leader is withholding similar documents and therefore believe it would be most efficient to brief both of these issues concurrently. If we do not receive information sufficient to sustain Leader's claims of privilege by Thursday, we will contact the Court on Friday morning to arrange a hearing and briefing schedule.

With respect to Craig's July 17 letter, thank you for directing me to Rowena's August 6th letter. That letter, however, does not address many of the issues in the July 17 letter. Please produce unobscured copies of LTI006824, 011466, 072133, 049196 and 009563 and provide unredacted versions or or explanations regarding the redactions in LTI038410, 038421 and 038430. Please also confirm, in writing, that Leader has not withheld any of the following categories of documents:

1. Documents referring or relating to Facebook;

2. Documents referring or relating to the '761 patent, its validity and/or enforceability,

3. Any prior art to the '761 patent or any related foreign or domestic patents or patent applications;

4. Documents referring or relating to any alleged infringement of the '761 patent by a third-party;

5. Documents referring or relating to any assignment of the '761 patent and any agreements between the named inventors;

6. Documents referring or relating to any efforts by Leader to sell, license, transfer or otherwise encumber the '761 patent or any interest therein;

7. Documents referring or relating to any pending patent applications related to the '761 patent, communications with the PTO and communications with the inventors;

8. Documents referring or relating to Leader's claims of willful infringement and Facebook's alleged notice of the '761 patent;

9. Documents referring or relating to Leader's damages and irreparable harm claims and the existence of any non-infringing alternatives;

10. Documents referring or relating to the corporate structure of Leader and any affiliated entities or predecessors; and

11. Documents referring or relating to any appraisals or valuations of the '761 patent;

Please also de-designate any public documents that were improperly produced under a confidentiality designation, such as LTI002923, 002927, 011258 and 011688.

Sincerely,

Jeff

From: Hannah, James [mailto:jhannah@KSLAW.com]
Sent: Monday, October 26, 2009 7:33 PM
To: Norberg, Jeffrey
Cc: Rovner, Philip A.; Kobialka, Lisa; Andre, Paul; Caponi, Steven L.; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa
Subject: Leader v. Facebook

Jeff,

I write in response to your July 17, October 8, October 12, and October 16 letters regarding various discovery issues.

In Facebook's July 17, 2009 letter from Craig Clark, he identified several of Leader's response to document requests. Leader and Facebook had a meet and confer on this subject and exchanged several letters on the matter. The last letter on the subject was sent from Rowena Young to Craig Clark on August 6, 2009. In this letter, we stated that Leader has or will produce all responsive, non-privileged, and conceivably relevant documents. Since we responded previously to this correspondence, we are unsure whether there is something more specific that Facebook believes is missing. We believe we have produced all responsive, non-privileged, and relevant documents. Nonetheless, we remain willing to discuss with you any specific issues that you would like to discuss with regard to Leader's document production. Please let me know.

In Facebook's October 8 letter, you requested reports which were referenced in LTI080788 and LTI080138. We are still looking into this issue and will get back to you.

In Facebook's October 12 letter, you identified several areas which you believed that Leader's privilege log was deficient. We have looked into your concerns and will be providing a supplementary privilege log before the close of written discovery. With regard to items marked with "THIS ENTRY NOT USED," these are indicate items which should not have appeared on the first privilege log and have been removed. We also note that we have not received Facebook's privilege log. Please confirm when we can expect it.

In Facebook's October 16 letter, you requested that Leader supplement Interrogatories Nos. 1 and 12-17. In an effort to provide more precise infringement contentions as you requested, and separate answers for Interrogatory Nos. 12-17, Leader will supplement its response to Interrogatory Nos. 1 and 12-17 by Wednesday, October 28, 2009.

We believe that this satisfies all outstanding issues that Facebook has raised. Please do not hesitate to contact me if you have any questions.

James

James Hannah
Attorney At Law
King & Spalding LLP

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333 Twin Dolphin Drive, Suite 400
Redwood Shores, CA 94065

San Francisco -
Four Embarcadero Center, Suite 3500
San Francisco, CA 94111

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Email: jhannah@kslaw.com

EXHIBIT B

KING & SPALDING

November 2, 2009

VIA E-MAIL

Jeffrey Norberg
Cooley Godward Kronish LLP
3000 El Camino Real
5 Palo Alto Square, 4th Floor
Palo Alto, CA 94306

> Re: Leader Technologies, Inc. v. Facebook, Inc., No. 1:08-cv-00862-JJF

Dear Jeff:

In addition to the correspondence we sent you on October 26, 2009, October 28, 2009 and October 30, 2009, we write in response to your emails dated October 26, 2009, October 27, 2009, October 28, 2009 and October 30, 2009.

Facebook's Document Production

In response to Leader's October 28, 2009 letter, Facebook stated that it has never represented that it has produced all documents responsive to Leader's Request for Production Nos. 4-8, 18, 23-31, 33-43, 54-59 and 64-65. Facebook's representation is disconcerting because it is not consistent with its previous positions. As you know, Leader and Facebook have met and conferred several times, and sent numerous correspondence regarding Facebook's document production. During those meet and confer efforts, we have focused particularly on Facebook's responses to Leader's Request for Production Nos. 4-8, 18, 23-31, 33-43, 54-59 and 64-65. Facebook represented at each of those meetings that it had produced all responsive documents. Leader was not satisfied with Facebook's representations because it is hard to believe that Facebook does not maintain the types of documents identified in Leader's discovery requests. As a result, Leader sought Court intervention to compel Facebook to produce responsive documents. During the hearing, Facebook, once again, represented that it had produced all documents responsive to Leader's discovery requests. Based on Facebook's representations, the Court denied Leader's motion to compel, but left open the possibility of sanctions if Leader was able to show that Facebook had not satisfied its discovery obligations.

Now, in your October 30, 2009 email, it appears that Facebook is now representing that it has not produced documents responsive to Leader's discovery requests. It seems that Facebook has withheld the production of its documents based on Leader's original definition of the Facebook website, rather than

Leader's identification of accused source code modules and the features implemented by those source code modules.[1]

Leader has told Facebook on numerous occasions, both orally and in written correspondence, that it is seeking discovery only on the source code modules identified in Leader's supplemental response to Facebook's Interrogatory No. 1 and the features implemented by those source code modules. Thus, Facebook's position that Leader seeks discovery on the entire Facebook website is disingenuous in light of our previous discussions.

To be perfectly clear, Leader only seeks discovery with regard to the source code modules identified in Leader response to Facebook's Interrogatory No. 1 and the features implemented by those source code modules. This applies to all discovery, including Leader's document requests, interrogatories, and requests for admission. Based on this understanding, please confirm or explain the following in writing:

1. Whether Facebook has produced all documents responsive to Leader's Request for Production Nos. 4-8, 18, 23-31, 33-43, 54-59 and 64-65;

2. If Facebook has not produced the requested documents, whether Facebook will produce all documents responsive to Leader's Request for Production Nos. 4-8, 18, 23-31, 33-43, 54-59 and 64-65;

3. If Facebook will not produce the requested documents, what is Facebook's basis for refusing to produce such documents?

In your October 30, 2009 email, it appears that Facebook may produce documents regarding the historical changes to the source code. We note that these documents are responsive Leader's discovery requests which were served in February. Please confirm, in writing, whether Facebook will produce documents which are sufficient to show historical changes to the source code. If Facebook will not produce these documents, please provide the basis for refusing to produce such documents. Of course, these documents, like all discovery requested by Leader, are limited to the accused source code modules and the features implemented by those modules.

In addition, Leader has been seeking the production of documents from previous litigations for some time. Please confirm, in writing, whether Facebook will produce these documents. If Facebook will not produce these documents, please provide its basis for refusing to produce these documents.

Facebook's Response to Leader's Interrogatories

It appears that Facebook is also refusing to provide answers to Leader's interrogatories because the interrogatories refer to the entire Facebook website. Again, to be clear, Leader is only seeking discovery on the accused source code modules and the features implemented by those source code modules. In light of this understanding, please confirm or explain the following in writing:

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[1] In our previous correspondence, we referred to the infringing functionality as the accused modules and the programs and/or applications implemented by those source code modules. Based on Facebook's document production, the programs and/or applications appear to be referred to as "features." For consistency sake, Leader will refer to the programs and/or applications that are implemented by the Facebook source code as "features."

1. Whether Facebook will provide responses to Leader's Interrogatories Nos. 1 and 2;

2. If Facebook will not provide the requested responses, what is Facebook's basis for refusing to provide responses to Leader's interrogatories?

Additionally, in your October 26, 2009 email, you stated that Facebook is reviewing whether it will supplement its responses to Leader's Interrogatory Nos. 15 and 16. As you know, Facebook did not provide a substantive response to these interrogatories. Please let us know, in writing, whether Facebook will provide responses to Leader's Interrogatories Nos. 15 and 16. If Facebook will not provide responses, please provide the basis for refusing to provide responses to these interrogatories.

Leader's Document Production

In your October 26, 2009 and October 27, 2009 emails, you refer to several reports and several categories of documents. In short, you ask Leader to confirm that it has produced responsive documents. Leader confirms that it has produced all responsive, relevant, and non-privileged documents pursuant to Facebook's discovery requests subject to Leader's objections. Once again, if there is something specific that is of concern with respect to Leader's document production, we invite you again, as we have in the past, to raise those specific issues with us.

In addition, in your October 27, 2009 email, you refer to several documents which appear have information obscured. We have investigated into the matter and determined the following:

- A clean copy of LTI006824 has already been produced to Facebook as LTI085430.

- A clean copy of LTI011466 has already been produced to Facebook as LTI034687.

- LTI049196 is the best copy available.

- LTI009563 is the best copy available.

- The marks on LTI038410, LTI038421 and LTI038430 are part of the original copies of the documents.

As for LTI072133, it is unclear why this particular document is of concern. Please review this document again and let me know if you still believe that there is any relevant information that you believe has been obscured.

Leader's Infringement Contentions

As you know, Leader has provided Facebook with detailed infringement contentions. In particular, Leader's infringement contentions contain citations to the public information, Facebook's source code, and Facebook's limited production of technical documents. Apparently, Facebook is not satisfied with Leader's infringement contentions because they allegedly contain qualifying language and allegedly do not contain sufficient detail.

With regard to the qualifying language, Leader is unclear as to Facebook's concerns. As you know, fact discovery is ongoing and will not close until March 2010. Leader expects to supplement its infringement contentions once it receives additional discovery from Facebook, including deposition

testimony from Facebook's engineers. Thus, the qualifying language has been provided, as Leader is maintaining its rights under the Federal Rules of Civil Procedure to supplement its response as appropriate as discovery continues in this case.

Furthermore, as stated above, it is now uncertain whether Facebook has produced all documents responsive to Leader's document requests. If Facebook has produced all such documents, Leader will consider removing the qualifying language with the understanding that it has the right to supplement its infringement contentions after further discovery in this case, including depositions of Facebook's engineers. If Facebook has not produced all such documents, Leader will supplement its infringement contentions once it has had an opportunity to review Facebook's document production.

In an effort to provide Facebook with more detailed infringement contentions, Leader suggested that Facebook provide it with a list of features that are implemented by the source code modules. After receiving this list, Leader agreed to supplement its infringement contentions, again, to provide responses with even greater detail. However, Facebook has refused to provide Leader with this list. Because this list was specifically requested by Leader's Interrogatory No. 25, it appears that Leader must wait until Facebook responds to this interrogatory before it can update its infringement contentions. Please let me know if Facebook changes its position so that we may update our infringement contentions sooner.

Additionally, you stated that the features that are implemented by the accused source code modules can be "gleaned from the Facebook source code." Can you please explain how this information is gleaned from the Facebook source code? We would appreciate any specific examples from you that would allow Leader to understand the features that are implemented by the accused source code modules on the Facebook website. If this information is as accessible from the source code as you suggested, Leader may be able to supplement its infringement contentions to Facebook's satisfaction.

Privileged Document

Leader maintains its assertion that LTI078262-4 is privileged. Leader requests that you confirm, in writing, that it has complied with the protective order by returning all copies of the document and certifying that Facebook will not use the information for any purpose, other than those outlined in the protective order. Leader further requests that you confirm, in writing, that any analyses, memorandum, or notes which were generated based on the document have been placed in sealed envelopes until this dispute is resolved.

To address the issues raised in your October 30, 2009 email, your reliance on *Corning, Inc. v. SRU Biosystems, LLC* is misplaced. 223 F.R.D. 189 (D.Del. 2004). *Corning* relates to potential investment in a company, while the communication between Leader and Oasis Capital relate to a potential investment in the litigation. *Id* at 190 ("the Court views the negotiations between these two corporations to reveal that SRU's disclosures to BD were made not in an effort to formulate a joint defense but rather to persuade BD to invest in SRU"). In *Corning*, the Court specifically relied on the solely commercial nature of investing in a company; while Leader and Oasis Capital shared a legal interest through a potential investment in the litigation. *Id.* Therefore, *Corning* does not stand for the proposition advanced by Facebook.

In fact, *Corning* supports Leader's position. *Corning* provides that continued protection applies in situations when the parties are allied in a common legal cause and the parties intended the resultant disclosures to be insulated from exposure beyond the confines of the group. *Id.* In our case, Leader and Oasis Capital were allied a common legal cause for the patent litigation. Furthermore, the parties

intended the communications to be insulated from exposure, as seen in marking the communication as attorney-client privileged and work product. As such, continued protection applies and LT1078262-4 is a privileged document.

We believe that this satisfies Facebook's concerns. If Facebook has any issues that remain, please let us know.
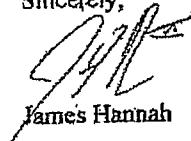
Next Steps

Leader has either addressed all of Facebook's outstanding issues or requested a written response from Facebook to understand exactly what the issues are between the parties. As such, there are no issues that are ripe for the Court's involvement as this point. Leader is confident that the parties will be able to resolve all issues between themselves. However, if issues remain after Leader receives a written response from Facebook, the parties can schedule a meet and confer at that time.

To the extent Facebook is concerned that it must file its motion to compel regarding LT1078262-4 within 15 court days, Leader agrees not to challenge Facebook's motion to compel as being untimely. We believe it is in the best interest of the parties, and the Court, to determine all outstanding issues through the meet and confer process and present them to the Court at once, rather that presenting a number of issues to the Court in piecemeal.

We look forward to your prompt responses. If you have any questions, feel free to contact me.

Sincerely,

James Hannah

EXHIBIT C

From: Hannah, James
Sent: Tuesday, November 03, 2009 4:00 PM
To: 'Norberg, Jeffrey'
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa; 'Caponi, Steven L.'
Subject: RE: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

Jeff,

The "letter writing campaign" is an unfortunate consequence of Facebook's actions. Facebook has taken positions with the Court that are directly contrary to the positions that Facebook advanced during the meet and confer process. As a result, we insist that Facebook put its positions in writing before the parties talk in person.

Furthermore, Facebook's refusal to even consider Leader's proposals is disingenuous. Facebook specifically asked Leader to propose options that would forgo Court involvement. Leader has now presented several proposals to Facebook which address all of the outstanding issues that Facebook has raised, including those listed below. Facebook's refusal to even consider Leader's proposals is not a good faith attempt to meet and confer.

We again ask that Facebook fully respond to Leader's November 2, 2009 letter. The sooner we receive Facebook's response, the sooner we can schedule a time for a call to attempt to resolve any outstanding issues.

Of course, Leader is in no way refusing to meet and confer in good faith. To the contrary, Leader is participating in the meet and confer process in order to find a resolution without assistance from the Court. We are confident that Facebook will participate as well by providing its positions to Leader in writing so that we may resolve any of the parties' concerns.

We look forward to Facebook's response to Leader's November 2, 2009 letter. Once we receive your response, we will promptly schedule a meet and confer if any outstanding issues remain.

James

From: Norberg, Jeffrey [mailto:jnorberg@cooley.com]
Sent: Tuesday, November 03, 2009 12:18 PM
To: Hannah, James
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa; 'Caponi, Steven L.'
Subject: RE: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

James,

It is obvious that the parties have reached an impasse in what appears to have become a letter writing campaign. The purpose of the meet and confer requirement is so that the parties talk person to person about the issues they are having in the hopes that resolution can come from human interaction. We are clearly at that point regarding the issues we have now been addressing for, in many cases, weeks. Therefore, we again request a meet and confer no later than noon tomorrow PST to address the following issues:

1. Facebook's desire that LTI supplement its response to Interrogatory No. 1 to limit it to actual charted contentions, without any qualifying language (much in the vein of our request last week regarding Interrogatory No. 4);

2. Facebook's motion to compel documents from LTI's privilege log and documents that LTI claims were inadvertently produced; and

3. LTI's improper addition of claims in violation of the Court's September 4, 2009 order.

Please confirm a time for a call to attempt to resolve these issues and answer any of LTI's concerns/questions no later than noon tomorrow. If you do not, we will take that as a refusal to meet and confer in good faith, person to person as the rule requires and take these issues immediately to the Court.

Sincerely,

Jeff

From: Hannah, James [mailto:jhannah@KSLAW.com]
Sent: Tuesday, November 03, 2009 10:52 AM
To: Norberg, Jeffrey
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa
Subject: RE: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

Jeff,

We do not believe that we can have a meaningful meet and confer until we fully understand Facebook's positions in writing. In our letter, we propose several options as a compromise to avoid Court involvement. We would like to understand Facebook's positions with regard to Leader's proposals. Additionally, there are several unanswered questions that Leader has requested a definitive response. We would like answers to these questions so that we can handle all outstanding issues at once, rather than in piecemeal fashion. Once we receive Facebook's complete response, in writing, to our letter dated November 2, 2009, we can schedule a meet and confer if any issues are left outstanding.

James

From: Norberg, Jeffrey [mailto:jnorberg@cooley.com]
Sent: Monday, November 02, 2009 7:23 PM
To: Hannah, James
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa
Subject: FW: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

James,

Your letter does not resolve the issues we have raised regarding LTI's compliance with the Court's September 4 Order and LTI's improper claims of privilege. In your e-mail on Friday you offered tomorrow (Tuesday) afternoon as an available meet and confer time. Please let me know your availability at 3:30 p.m.

Sincerely,

Jeff

From: Hannah, James [mailto:jhannah@KSLAW.com]
Sent: Monday, November 02, 2009 6:39 PM
To: Norberg, Jeffrey
Cc: Kobialka, Lisa; Keefe, Heidi; Weinstein, Mark; Keyes, Melissa; (caponi@blankrome.com); Philip A. Rovner (provner@potteranderson.com)
Subject: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

Dear Counsel,

Please see attached correspondence from James Hannah to Jeffrey Norberg.

James

James Hannah
Attorney At Law
King & Spalding LLP

Silicon Valley -
333 Twin Dolphin Drive, Suite 400
Redwood Shores, CA 94065

San Francisco -
Four Embarcadero Center, Suite 3500
San Francisco, CA 94111

Phone (SV & SF): (650) 590-0726
Fax (SV & SF): (650) 590-1900
Email: jhannah@kslaw.com

EXHIBIT D

----- Original Message -----
From: Norberg, Jeffrey <jnorberg@cooley.com>
To: Hannah, James
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.' <provner@potteranderson.com>; Keefe, Heidi <hkeefe@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Keyes, Melissa <mkeyes@cooley.com>; 'Caponi, Steven L.' <Caponi@BlankRome.com>
Sent: Tue Nov 03 21:21:49 2009
Subject: RE: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

James,

We are disappointed that you have once again rejected our request for a live meet and confer as required by the rules. The issues you raised in your letter yesterday are unrelated to the discovery issues that we first wrote you about over two weeks ago. Your insistence upon receiving written responses on these unrelated issues is nothing more than an effort to further delay the process of resolving Facebook's complaints regarding LTI's failure to comply with the September 4 Order and LTI's privilege log.

That aside, in an effort to move this process forward, we respond to the issues raised in your letter as follows:

Facebook's document production: The Court recently ruled on LTI's motion to compel further productions of technical, financial and marketing documents. We see no reason to revisit the Court's ruling on these three categories. We remain willing to meet and confer to the extent LTI believes that there are any other categories of documents that Facebook should produce.

Documents from prior litigation: As we have repeatedly stated, and the Court has agreed in its denials, LTI's request for every document from all prior litigation involving Facebook is overbroad. We will consider any reasonable request LTI wishes to make to narrow its requests, but reiterate that this has nothing to do with your supplements regarding your infringement contentions or clawed back documents /privilege log.

Facebook's responses to LTI's Interrogatory Nos. 1 and 2: LTI's offer to narrow these interrogatories to the "accused source code modules" does not obviate Facebook's overbreadth and burden objections. In any event, the information responsive to these Interrogatories can be found in Facebook's production of source code and technical documents. To the extent LTI seeks information regarding historical versions of the source code, Facebook will produce such information for review by LTI under the provisions

of the Stipulated Protective Order, but reiterate that you have had the code for well over a month, so this request also does not effect your supplements regarding your infringement contentions or clawed back documents / privilege log.

Facebook's responses to LTI's Interrogatory Nos. 15 and 16: The information sought by LTI in these interrogatories can be found in Facebook's production of source code and technical documents.

LTI's proposal: Facebook maintains that the source code speaks for itself and we will not agree to do any analysis that LTI can do on its own.

As we stated below, we remain open to a telephonic meet and confer through tomorrow at noon, after which we will contact the Court to schedule a discovery conference regarding LTI's failure to comply with the September 4 Order and improper withholding of non-privileged documents. We will, of course, continue to be available to meet and confer even after scheduling a conference. However, we do not believe the resolution of these issues should be delayed any longer.

Sincerely,

Jeff

Jeff,

The "letter writing campaign" is an unfortunate consequence of Facebook's actions. Facebook has taken positions with the Court that are directly contrary to the positions that Facebook advanced during the meet and confer process. As a result, we insist that Facebook put its positions in writing before the parties talk in person.

Furthermore, Facebook's refusal to even consider Leader's proposals is disingenuous. Facebook specifically asked Leader to propose options that would forgo Court involvement. Leader has now presented several proposals to Facebook which address all of the outstanding issues that Facebook has raised, including those listed below. Facebook's refusal to even consider Leader's proposals is not a good faith attempt to meet and confer.

We again ask that Facebook fully respond to Leader's November 2, 2009 letter. The sooner we receive Facebook's response, the sooner we can schedule a time for a call to attempt to resolve any outstanding issues.

Of course, Leader is in no way refusing to meet and confer in good faith. To the contrary, Leader is participating in the meet and confer process in order to find a resolution without assistance from the Court. We are confident that Facebook will participate as well by providing its positions to Leader in writing so that we may resolve any of the parties' concerns.

We look forward to Facebook's response to Leader's November 2, 2009 letter. Once we receive your response, we will promptly schedule a meet and confer if any outstanding issues remain.

James

James,

It is obvious that the parties have reached an impasse in what appears to have
become a letter writing campaign. The purpose of the meet and confer requirement is so
that the parties talk person to person about the issues they are having in the hopes that
resolution can come from human interaction. We are clearly at that point regarding the
issues we have now been addressing for, in many cases, weeks. Therefore, we again request
a meet and confer no later than noon tomorrow PST to address the following issues:

1. Facebook's desire that LTI supplement its response to Interrogatory No. 1 to
limit it to actual charted contentions, without any qualifying language (much in the vein
of our request last week regarding Interrogatory No. 4);

2. Facebook's motion to compel documents from LTI's privilege log and documents that
LTI claims were inadvertently produced; and

3. LTI's improper addition of claims in violation of the Court's September 4, 2009
order.

Please confirm a time for a call to attempt to resolve these issues and answer any
of LTI's concerns/questions no later than noon tomorrow. If you do not, we will take that
as a refusal to meet and confer in good faith, person to person as the rule requires and
take these issues immediately to the Court.

Sincerely,

Jeff

From: Hannah, James [mailto:jhannah@KSLAW.com]
Sent: Tuesday, November 03, 2009 10:52 AM
To: Norberg, Jeffrey
Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein, Mark;
Keyes, Melissa
     Subject: RE: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

Jeff,

We do not believe that we can have a meaningful meet and confer until we fully
understand Facebook's positions in writing. In our letter, we propose several options as a
compromise to avoid Court involvement. We would like to understand Facebook's positions
with regard to Leader's proposals. Additionally, there are several unanswered questions
that Leader has requested a definitive response. We would like answers to these questions
so that we can handle all outstanding issues at once, rather than in piecemeal fashion.
Once we receive Facebook's complete response, in writing, to our letter dated November 2,
2009, we can schedule a meet and confer if any issues are left outstanding.

James

From: Norberg, Jeffrey [mailto:jnorberg@cooley.com]
Sent: Monday, November 02, 2009 7:23 PM
To: Hannah, James
     Cc: Kobialka, Lisa; Andre, Paul; 'Rovner, Philip A.'; Keefe, Heidi; Weinstein,
Mark; Keyes, Melissa

Subject: FW: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

James,

Your letter does not resolve the issues we have raised regarding LTI's compliance with the Court's September 4 Order and LTI's improper claims of privilege. In your e-mail on Friday you offered tomorrow (Tuesday) afternoon as an available meet and confer time. Please let me know your availability at 3:30 p.m.

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From: Hannah, James [mailto:jhannah@KSLAW.com]
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Subject: Leader v. Facebook - 2009-11-02 - Ltr to Norberg re Discovery Issues

Dear Counsel,

Please see attached correspondence from James Hannah to Jeffrey Norberg.

James

James Hannah
Attorney At Law
King & Spalding LLP

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333 Twin Dolphin Drive, Suite 400
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Email: jhannah@kslaw.com

EXHIBIT E

THIS EXHIBIT HAS BEEN

REDACTED IN ITS ENTIRETY

EXHIBIT F

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 ("LTI") 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.

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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,

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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")

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/UILU-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).[1]

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[1] 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[2]

- 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")

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[2] 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 gratned 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

1}.

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.

Claim Language of '761 Patent	Invalidating Prior Art
1. A computer-implemented network-based system that facilitates management of data, comprising:	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.

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

Claim Language of '761 Patent	Invalidating Prior Art
	LaMarca '682 at, e.g., abstract.
	Lamping '538 at, e.g., col. 1.
	Lamping '551 at, e.g., Abstract, col. 7-8, 10-12, *passim*; claim 7.
	MacNaughton '892 at, e.g., abstract; claim 1.
	Maritzen '181 at, e.g., abstract; p. 5; claim 22.
	Nochur '758 at, e.g., col. 3-4, 9; claim 15.
	O'Rourke '813 at, e.g., abstract, col. 5; claims 1, 3, 5, 8, 10, 16, 20, 23, 30-32, 38-39.
	Oblinger '990 at, e.g., abstract; claim 1.
	Petersen '179 at, e.g., col. 1-2, 6.
	Pitroda '990 at, e.g., col. 1-2, 5, 7; claims 1, 12, 17, 22.
	Pizi '258 at, e.g., abstract; col. 6; claim 1.
	Salisbury '231 at, e.g., abstract; claim 16.
	Salisbury '573 at, e.g., abstract; claim 6.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 1-2, 9; fig. 7.
	Seliger '908 at, e.g., abstract; col. 3-4; claim 35.
	Shea '938 at, e.g., abstract.
	Suchter '161 at, e.g., abstract; fig. 1A-1B, 6.
	Suchter '302 at, e.g., abstract; fig. 1A-1B, 6.
	Swartz '994 at, e.g., col. 1, 3.
	Sykes '297 at, e.g., abstract.
	Terry '380 at, e.g., abstract.
	Thornton '429 at, e.g., abstract.; claim 12
	Zuberec '032 at, e.g., abstract; col. 7.
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	Belifore '513 at, e.g., col. 3-4, 10-17, 20-21, 29-32; fig. 5.
	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.

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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.	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, *supra*. 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.

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

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	6.
	Suchter '302 at, e.g., col. 4-5, 8, 14, 17-21; fig. 1A-1B, 4B, 6.
	Swartz '994 at, e.g., col. 4, 6-10, 17-20.
	Sykes '297 at, e.g., abstract; p. 1; fig. 1; claim 42.
	Terry '380 at, e.g., col. 10-11, 14, , 17; fig. 1-2; claim 1, 11, 14-15.
	Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1; claim 12.
	Zuberec '032 at, e.g., abstract; col. 2, 6-7; claim 1, 13.
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.	Belifore '513 at, e.g., col. 15-16, 29; fig.1.
	Bellotti '409 at, e.g., p. 8.
	Bensimon '678 at, e.g., p. 1; fig. 1-2.
	Bly '853 at, e.g., col. 2-3, 15.
	Brummel '220 at, e.g., col. 2-4; fig. 4.
	Chasen '721 at, e.g., claim 1.
	Chronaki at, e.g., p. 260.
	Dourish '217 at, e.g., fig. 4.
	Dourish '575 at, e.g., col. 4-8, figs. 1-7.
	Dourish '982 at, e.g., col. 3.
	Dourish Building Bridges at, e.g., 15-16, 18.
	Dourish Presto at, e.g., fig. 3; pp. 6, 9-10, 16.
	Edwards '076 at, e.g., col. 10-11; fig. 1, 4.
	Edwards '553 at, e.g., col. 11, 13; fig. 1.
	Estrada '148 at, e.g., col. 8-9; fig. 9.
	Falkenhainer '801 at, e.g., col. 4; fig. 3.
	Farnan '365 at, e.g., col. 1; fig. 2.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gillings '490 at, e.g., fig. 2, 6.
	Gongwer '118 at, e.g., col. 3-4, 11; fig. 1.

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

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	Seliger '908 at, e.g., col. 2; fig. 1, 4, 7; claim 35.
	Shea '938 at, e.g., col. 2-3, 9.
	Suchther '161 at, e.g., fig. 1A-1B, 3A-4A.
	Suchther '302 at, e.g., fig. 1A-1B, 3A-4A.
	Swartz '994 at, e.g., col. 20; fig. 5.
	Sykes '297 at. e,g., fig. 3-12.
	Terry '380 at, e.g., col. 11, 13; fig. 1; claim 1, 11, 15.
	Thornton '429 at, e.g., col. 10; fig. 4-5.
	Zuberec '032 at, e.g., abstract; col. 3.
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.	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.
	Chasen '721 at, e.g., col. 1, 3, 10, 13-14; fig. 1.
	Chronaki at, e.g., pp. 261-62, 264.
	Dourish '217 at, e.g., col. 7; fig. 4.
	Dourish '575 at, e.g., col. 4-7, figs. 1-5.
	Dourish '982 at, e.g., col. 5.
	Dourish Building Bridges at, e.g., 14-16, 17 (including fig. 3), 18.
	Dourish Presto at e.g., fig. 2; pp. 4, 16.
	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., col. 4, 11; fig. 10; Table 1A.

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

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

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	Gongwer '118 at, e.g., col. 9-10.
	Grambihler '655 at, e.g., col. 1-2.
	Henderson '534 at, e.g., abstract; p. 6.
	Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 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. 3-5, 7-8; claims 1, 50.
	Horvitz '484 at, e.g., pp. 1-2, 30-31;fig. 1, 3-5, 8.
	Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1(16).
	Hugh '032 at, e.g., col. 5-6, 13; fig. 1-3.
	iManage MailSite at, e.g., Chapters 3, 5.
	iManage System, e.g., see disclosures for iManage MailSite.
	Johnson at, e.g., p. 187.
	Jones '731 at, e.g., col. 7-10, fig. 6-11, fig. 12 (showing multiple contexts).
	Koren '596 at, e.g., col. 15, 21.
	LaMarca '670 at, e.g., col. 9-10.
	LaMarca '682 at, e.g., col. 7-8, fig. 1.
	Lamping '538 at, e.g., col. 6-7.
	Lamping '551 at, e.g., col. 12-16, fig. 1-5.
	MacNaughton '892 at, e.g., col. 8, 17.
	Maritzen '181 at, e.g., pp. 5-6.
	Nochur '758 at, e.g., col. 3-4.
	O'Rourke '813 at, e.g., fig. 5.
	Oblinger '990 at, e.g., fig. 3, 5.
	Petersen '179 at, e.g., col. 6-7.
	Pitroda '990 at, e.g., col. 6, 8, 13.
	Pizi '258 at, e.g., col. 5-7.
	Salisbury '231 at, e.g., col. 9-10; fig. 1.

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

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

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

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

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

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

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	Pitroda '990 at, e.g., col. 1, 3.
	Pizi '258 at, e.g., abstract; col. 6.
	Salisbury '231 at, e.g., abstract; claim 12.
	Salisbury '573 at, e.g., abstract; claim 8.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 1-2, 9; fig. 7.
	Seliger '908 at, e.g., abstract; col. 3-4; claim 1.
	Shea '938 at, e.g., abstract.
	Suchter '161 at, e.g., abstract; fig. 1A-1B, 6; claim 1.
	Suchter '302 at, e.g., abstract; fig. 1A-1B, 6; claim 1.
	Swartz '994 at, e.g., col. 1, 3-4.
	Sykes '297 at, e.g., abstract; claim 1.
	Terry '380 at, e.g., abstract.
	Thornton '429 at, e.g., abstract; claim 1.
	Zuberec '032 at, e.g., abstract; col. 7; claim 1.
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	Belifore '513 at, e.g., col. 2-4, 10-17, 20-21, 28-32; fig. 1, 5.
	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. 2-9; claim 1, 3, 8.
	Chasen '721 at, e.g., abstract; col. 1-5, 10-16; fig. 2; claim 1.
	Chronaki at, e.g., abstract; pp. 259-65; 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., 15-16, 18.
	Dourish Presto at, e.g., fig. 1; pp. 1-2, 4, 5-8, 11, 15-19.
	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,

Claim Language of '761 Patent	Invalidating Prior Art
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.	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, 26; fig. 4-10; Table 1A, 1C; claim 1, 2, 4, 37. Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*. Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10. Gongwer '118 at, e.g., col. 3-4, 6-10; claims 1, 8, 14-15, 17. 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, 2.2.1, 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. 1-2; claim 1, 7. Horvitz '484 at, e.g., abstract; pp. 1-2, 5-7, 9, 14, 27-28, 30-31; fig. 1-5. Hubert '934 at, e.g., col. 2-4, Fig. 1-2, col. 5-8. Hugh '032 at, e.g., col. 3, 5-6, 13, 20-22, 24, 27-28; fig. 1, 3. iManage MailSite at, e.g., Chapters 3-5. iManage System, e.g., see disclosures for iManage MailSite. Johnson at, e.g., p. 187. Jones '731 at, e.g., col. 2-3 (summary), 4-12 (description), figs. 2-12. claim 1. Koren '596 at, e.g., col. 1-2, 5, 10, 14-15, 21-23; fig. 2, 5A, 24A, 32. LaMarca '670 at, e.g., abstract; col. 1-2, 10-11; fig. 3, 5. LaMarca '682 at, e.g., abstract; col. 7-8, 10-12; fig. 1; claim 1. Lamping '538 at, e.g., col. 1-4, 6-8. Lamping '551 at, e.g., abstract; cols. 2, 9-16, figs. 1-5.

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

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10. The method of claim 9, further comprising capturing context information of the user.	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, *supra*.
	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.

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

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user environment such that a plurality of users can access the content from an associated plurality of user environments.	Bellotti '409 at, e.g., p. 11.
	Bensimmon '678 at, e.g., fig. 1-2; p. 1.
	Bly '853 at, e.g., abstract; col. 1, 8, 28; claim 1.
	Brummel '220 at, e.g., col. 2, 6; fig. 4.
	Chasen '721 at, e.g., col. 6.
	Chronaki at, e.g., p. 260.
	Dourish '217 at, e.g., col. 9-10.
	Dourish '575 at, e.g., col. 4-8, figs. 1-7 (all discussing filing structures); claim 1(a)-(b), *passim*.
	Dourish '982 at, e.g., col. 5.
	Dourish Building Bridges at, e.g., 14-18, figs. 2-3.
	Dourish Presto at, e.g., fig. 2; pp. 4-6, 8.
	Edwards '076 at, e.g., col. 11, 13-16; fig. 1, 3.
	Edwards '553 at, e.g., col. 9.
	Estrada '148 at, e.g., col. 5, 16-17.
	Falkenhainer '801 at, e.g., col. 3, 5; fig. 1.
	Farnan '365 at, e.g., col. 10; fig. 2, 10, 12; claim 13.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gillings '490 at, e.g., col. 3-4; fig. 1.
	Gongwer '118 at, e.g., col. 1; claims 1, 4, 7, 17.
	Grambihler '655 at, e.g., abstract; fig. 1.
	Henderson '534 at, e.g., abstract; pp. 2, 4-5, 7.
	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. 3, 5, 7; fig. 1; claims 1-2, 4.
	Horvitz '484 at, e.g., pp. 4, 30; fig. 3.
	Hubert '934 at, e.g., fig. 2 (30, 32, 34); col. 2-3, 4-5, 7-8.
	Hugh '032 at, e.g., col. 26-28.
	iManage MailSite at, e.g., Chapters 3 & 5.

Claim Language of '761 Patent	Invalidating Prior Art
	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.
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.

1}.

Claim Language of '761 Patent	Invalidating Prior Art
application is associated automatically with the second user environment.	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.
	Farnan '365 at, e.g., col. 5-6; claim 1, 37.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	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 & 5.

Claim Language of '761 Patent	Invalidating Prior Art
	iManage System, e.g., see disclosures for iManage MailSite.
	Johnson at, e.g., p. 187.
	Jones '731 at, e.g., col. 7-9, fig. 6-10, 12.
	Koren '596 at, e.g., col. 2, 10, 14-15, 21; fig. 35-36.
	LaMarca '670 at, e.g., col. 10-11.
	LaMarca '682 at, e.g., col. 7, 14.
	Lamping '538 at, e.g., col. 2, 7.
	Lamping '551 at, e.g., cols. 9-16, fig. 5.
	MacNaughton '892 at, e.g., col. 6-8, 16-19; fig. 1A-1B, 3-4.
	Maritzen '181 at, e.g., abstract; pp. 3-4, 6; fig. 7-9; claim 12.
	Nochur '758 at, e.g., col. 6, 10, 13-14.
	O'Rourke '813 at, e.g., 2-9; fig. 3, 5; claim 1, 23.
	Oblinger '990 at, e.g., abstract; col. 6-9; fig. 1-2; claim 15-17, 21.
	Pitroda '990 at, e.g., col. 6, 8, 13, 21-22.
	Pizi '258 at, e.g., col. 2, 4-5, 7; claim 1.
	Salisbury '231 at, e.g., col. 10; claim 12.
	Salisbury '573 at, e.g., col. 8, 10.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 2, 8-9.
	Seliger '908 at, e.g., col. 2-5, 8-9; fig. 1, 4, 14-16; claim 1.
	Shea '938 at, e.g., abstract.
	Suchter '161 at, e.g., col. 5, 19-20; fig. 4B.
	Suchter '302 at, e.g., col. 5, 19-20; fig. 4B.
	Swartz '994 at, e.g., col. 19-20.
	Terry '380 at, e.g., abstract; col. 9-10, 17.
	Thornton '429 at, e.g., col. col. 14-15; claim 12.
	Zuberec '032 at, e.g., abstract; col. 6-7; claims 1, 13.
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.	Bellotti '409 at, e.g., p. 2.
	Bensimmon '678 at, e.g., p. 1.
	Bly '853 at, e.g., col. 15.
	Brummel '220 at, e.g., col. 4.
	Chasen '721 at, e.g., col. 10, 17.
	Chronaki at, e.g., pp. 259, 263.
	December at e.g., pp. 330-335.
	Dourish '217 at, e.g., col. 11.
	Dourish '575 at, e.g., col. 3, 5, 6, claim 12.
	Dourish '982 at, e.g., col. 6.
	Dourish Building Bridges at, e.g., fig. 3, p. 16 ("web-based prototype").
	Dourish Presto at, e.g., fig. 3; pp. 15-19.
	Edwards '076 at, e.g., col. 12.
	Edwards '553 at, e.g., col. 9, 14.
	Estrada '148 at, e.g., col. 5-6; fig. 2-3, 5-6, 9, 13-14, 16, 33, 35.
	Falkenhainer '801 at, e.g., abstract; col. 3.
	Farnan '365 at, e.g., col. 4, 14; Table 1A.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gongwer '118 at, e.g., col. 9.
	Grambihler '655 at, e.g., col. 3-4.
	Henderson '534 at, e.g., p. 1.
	Hess CFS at, e.g., § 5 (inc. Fig. 4).
	Hess Thesis at, e.g., §§ 4.1, 7, 7.1, 7.4.
	Hind '791 at, e.g., col. 3, 5; fig. 1-2.
	Horvitz '484 at, e.g., pp. 3, 5-6; fig. 1.
	Hubert '934 at, e.g., col 7(table showing URL, reference to Web Server).
	Hugh '032 at, e.g., col. 3, 26, 31.
	iManage MailSite at, e.g., 33-34 (inc. fig. 2.1).
	iManage System, e.g., see disclosures for iManage MailSite.

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

Claim Language of '761 Patent	Invalidating Prior Art
TCP/IP communication protocol.	Belifore '513 at, e.g., col. 2, 4, 20, 28; fig. 1.
	Bellotti '409 at, e.g., p. 2.
	Bensimmon '678 at, e.g., pp. 1, 5-6.
	Bly '853 at, e.g., col. 15.
	Brummel '220 at, e.g., col. 4.
	Chasen '721 at, e.g., col. 10, 17.
	Chronaki at, e.g., pp. 263-64.
	December at e.g., pp. 330-335.
	Dourish '217 at, e.g., col. 11.
	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.
	Dourish '982 at, e.g., col. 6.
	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.
	Dourish Presto at, e.g., fig. 1; pp. 7, 15.
	Edwards '076 at, e.g., col. 12.
	Edwards '553 at, e.g., col. 9, 14.
	Estrada '148 at, e.g., col. 10; fig. 3.
	Falkenhainer '801 at, e.g., abstract; col. 3, 13; fig. 1.
	Farnan '365 at, e.g., col. 4, 14; Table 1A.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gongwer '118 at, e.g., col. 9.
	Grambihler '655 at, e.g., col. 3-4.
	Henderson '534 at, e.g., p. 1.
	Hess CFS at, e.g., § 5.
	Hind '791 at, e.g., col. 3, 5; fig. 1-2.
	Horvitz '484 at, e.g., pp. 3, 5-6; fig. 1.
	Hubert '934 at, e.g., col 7(table showing URL, reference to

1}.

Claim Language of '761 Patent	Invalidating Prior Art
	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.
	Hugh '032 at, e.g., col. 3, 26, 31.
	iManage MailSite at, e.g., 15, 33-34 (inc. fig. 2.1).
	iManage System, e.g., see disclosures for iManage MailSite.
	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.
	Koren '596 at, e.g., col. 6.
	LaMarca '670 at, e.g., fig. 5.
	LaMarca '682 at, e.g., col. 12.
	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.
	Lamping '551 at, e.g., col. 13.
	MacNaughton '892 at, e.g., abstract; col. 5; fig. 1A, 6; claims 1-3, 12.
	Maritzen '181 at, e.g., p. 6.
	Microsoft Dictionary at, e.g., p. 462 (definition of TCP/IP), p. 505 (definition of web browser).
	Oblinger '990 at, e.g., col. 6.
	Petersen '179 at, e.g., col. 1-2.
	Pitroda '990 at, e.g., cols. 7, 23, 52.
	Pizi '258 at, e.g., col. 6.
	Salisbury '231 at, e.g., col. 16.
	Salisbury '573 at, e.g., col. 12.
	Seliger '648 at, e.g., col. 4, 14-15; fig. 16.
	Seliger '908 at, e.g., col. 12-13.
	Suchter '161 at, e.g., col. 4-5, 7; fig. 1A-1B, 6.

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

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

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

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

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

Claim Language of '761 Patent	Invalidating Prior Art
	Suchter '302 at, e.g., abstract; fig. 1A-1B, 6; claim 30. Swartz '994 at, e.g., col. 1, 3; fig. 3, 5. Sykes '297 at, e.g., abstract; p. 2; claim 15, 29. Terry '380 at, e.g., abstract. Thornton '429 at, e.g., abstract. Zuberec '032 at, e.g., abstract; col. 7; claims 13, 19, 24.
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.	*See disclosures for claim 1, supra, which are incorporated herein by reference.* Belifore '513 at, e.g., col. 2-4, 10-19, 20-21, 28-32, 43-45; fig. 1, 5. 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, 15, 17-19, 24, 28-29; fig. 2; claim 1. Brummel '220 at, e.g., col. 2-10; fig. 4; claims 1, 3, 8, 24. Chasen '721 at, e.g., abstract; col. 1-6, 10-16; fig. 2; claim 1. Chronaki at, e.g., pp. 260-65; fig. 6-7. Dourish '217 at, e.g., col. 7, 9-10, 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, 2; pp. 1-2, 4-8, 11, 15-19. 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, 16-17, 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, 10-13, 26; fig. 2, 4-10; Table 1A, 1C; claim 1, 2, 4.

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

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

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

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

Claim Language of '761 Patent	Invalidating Prior Art
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.	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, *supra*.
	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.

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

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

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

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	Pitroda '990 at, e.g., col. 8, 13, 19.
	Salisbury '231 at, e.g., col. 11.
	Salisbury '573 at, e.g., col. 11-12, 16-17; fig. 3, 6.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 2.
	Seliger '908 at, e.g., col. 2-5, 8-9.
	Shea '938 at, e.g., col. 6.
	Suchter '161 at, e.g., col. 7.
	Suchter '302 at, e.g., col. 7.
	Swartz '994 at, e.g., col. 6-8.
	Terry '380 at, e.g., col. 11-12.
	Thornton '429 at, e.g., col. 11, 13-14; fig. 4-5.
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.	*See claim 5, supra, the disclosures of which are incorporated herein by reference.*
	Belifore '513 at, e.g., col. 15-16.
	Bellotti '409 at, e.g., p. 5; claims 1-2.
	Bensimmon '678 at, e.g., p. 1.
	Bly '853 at, e.g., col. 24, 28-29.
	Brummel '220 at, e.g., col. 3, 5-6; fig. 4.
	Chasen '721 at, e.g., col. 14-15.
	Chronaki at, e.g., pp. 260-61; fig. 7.
	Dourish '217 at, e.g., col. 7-8; fig. 1, 3.
	Dourish '575 at, e.g., col. 4-8 (discussion of initial filing context); figs. 1-7.
	Dourish '982 at, e.g., col. 5.
	Dourish Building Bridges at, e.g., 14-16 & fig. 2, 16.
	Dourish Presto at, e.g., fig. 2, 3; pp. 4, 9-10, 16-19.
	Edwards '076 at, e.g., col. 9, 13-14; fig. 1, 3.
	Edwards '553 at, e.g., col. 9-13; fig. 1, 2.
	Estrada '148 at, e.g., 17, 21; Table 2.

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	Falkenhainer '801 at, e.g., col. 5, 13.
	Farnan '365 at, e.g., col. 5-6.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gillings '490 at, e.g., col. 3-4; fig. 1.
	Gongwer '118 at, e.g., col. 9-10.
	Grambihler '655 at, e.g., col. 1-2.
	Henderson '534 at, e.g., abstract; p. 6.
	Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 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. 3-5, 7-8, claim 50.
	Hubert '934 at, e.g., col. 4-5, 7-8; fig. 2, fig 1(16).
	Hugh '032 at, e.g., col. 5-6, 13; fig. 1-3.
	iManage MailSite at, e.g., Chapters 3 & 5.
	iManage System, e.g., see disclosures for iManage MailSite.
	Johnson at, e.g., p. 187.
	Jones '731 at, e.g., col. 7-10, fig. 6-11, fig. 12 (showing multiple contexts).
	Koren '596 at, e.g., col. 15, 21.
	LaMarca '670 at, e.g., col. 9-11.
	LaMarca '682 at, e.g., col. 7-8, fig. 1.
	Lamping '538 at, e.g., col. 6-7.
	Lamping '551 at, e.g., col. 12-16, fig. 1-5.
	MacNaughton '892 at, e.g., col. 8, 17.
	Maritzen '181 at, e.g., pp. 5-6.
	Nochur '758 at, e.g., col. 3-4.
	O'Rourke '813 at, e.g., fig. 5.
	Oblinger '990 at, e.g., fig. 3, 5.
	Petersen '179 at, e.g., col. 6-7.
	Pitroda '990 at, e.g., col. 6, 8, 13.

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	Pizi '258 at, e.g., col. 5-7.
	Salisbury '231 at, e.g., col. 9-10; fig. 1.
	Salisbury '573 at, e.g., col. 8; fig. 1.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 2, 8-9.
	Seliger '908 at, e.g., col. 3-4, 6; claim 35.
	Shea '938 at, e.g., abstract; col. 5, 8; fig. 1.
	Suchter '161 at, e.g., col. 14; fig. 3A-3B, 4A.
	Suchter '302 at, e.g., col. 14; fig. 3A-3B, 4A.
	Swartz '994 at, e.g., col. 4, 6, 19.
	Terry '380 at, e.g., fig. 1; claims 1, 11, 15.
	Thornton '429 at, e.g., fig. 3.
	Zuberec '032 at, e.g., col. 6-7; claims 16, 21.
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.	Belifore '513 at, e.g., col. 16-17, 20, 29, 43-45.
	Bellotti '409 at, e.g., pp. 5-6; fig. 9-10.
	Bensimmon '678 at, e.g., p. 1.
	Bly '853 at, e.g., col. 23-24, 26-27; fig. 13.
	Brummel '220 at, e.g., col. 3-6; fig. 4.
	Chasen '721 at, e.g., col. 4-5, 16-17.
	Chronaki at, e.g., pp. 260-61.
	Dourish '217 at, e.g., col. 4-5, 15-16.
	Dourish '575 at, e.g., col. 4-8; figs. 1-7.
	Dourish '982 at, e.g., col. 3, 5-8; fig. 8.
	Dourish Building Bridges at, e.g., 14-17, figs 2-3.
	Dourish Presto at fig. 3; pp. 3, 6-8, 12, 16-18; claim 1.
	Edwards '076 at, e.g., col. 7, 9.
	Edwards '553 at, e.g., col. 7, 9; fig. 1, 2.
	Estrada '148 at, e.g., col. 21.
	Falkenhainer '801 at, e.g., col. 3-4.

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

Claim Language of '761 Patent	Invalidating Prior Art
	Pizi '258 at, e.g., col. 5-6.
	Salisbury '231 at, e.g., col. 9-10; fig. 1.
	Salisbury '573 at, e.g., col. 8, 11-12, 16-17; fig. 1, 3, 6.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., fig. 16.
	Seliger '908 at, e.g., col. 1-2.
	Shea '938 at, e.g., abstract; fig. 2-3, 6-7.
	Suchter '161 at, e.g., col. 9-11; fig. 3A-3B.
	Suchter '302 at, e.g., col. 9-11; fig. 3A-3B.
	Swartz '994 at, e.g., col. 20.
	Terry '380 at, e.g., col. 9, 17-18.
	Thornton '429 at, e.g., col. 11, 13-14; fig. 4-5.
	Zuberec '032 at, e.g., abstract; col. 1-2, 7; fig. 5.
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.	Belifore '513 at, e.g., col. 10-17, 20-21, 29-31; fig. 5.
	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., pp. 260-65; fig. 7.
	Dourish '217 at, e.g., col. 16.
	Dourish '575 at, e.g., col. 4-8; figs. 1-7.
	Dourish '982 at, e.g., col. 3, 6-7.
	Dourish Building Bridges at, e.g., 14-19, figs. 2-3.
	Dourish Presto at figs. 2, 3; pp. 4, 7, 18.
	Edwards '076 at, e.g., col. 14-16.
	Edwards '553 at, e.g., col. 7, 9, 11-13.
	Estrada '148 at, e.g., col. 8, 21; fig. 10, 14-15; Table 2.
	Falkenhainer '801 at, e.g., col. 1-6, 11-12.

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

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

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

Claim Language of '761 Patent	Invalidating Prior Art
	Falkenhainer '801 at, e.g., col. 6.
	Farnan '365 at, e.g., col. 3-6; fig. 10, 12.
	Gaia/CFS, e.g., see disclosures for Hess CFS, *supra*.
	Gillings '490 at, e.g., col. 2-4, 6-7; fig. 8-10.
	Gongwer '118 at, e.g., col. 1; claims 1, 45.
	Grambighler '655 at, e.g., col. 5-7.
	Henderson '534 at, e.g., pp. 2-6.
	Hess CFS at, e.g., Abstract, §§ 1, 2, 2.1, 2.2, 3.1, 4.2, 4.3, 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. 11.
	Horvitz '484 at, e.g., pp. 1-2; 2-28, 30-31; fig. 1, 3-5.
	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 & 5.
	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. 15.
	LaMarca '670 at, e.g., fig. 3.
	LaMarca '682 at, e.g., col. 7-8, 14; fig. 1.
	Lamping '538 at, e.g., col. 4, 8.
	Lamping '551 at, e.g., col. 13-16, fig. 1-5.
	MacNaughton '892 at, e.g., col. 5-8, 16-19.
	Maritzen '181 at, e.g., p. 5.
	Nochur '758 at, e.g., col. 5.
	O'Rourke '813 at, e.g., fig. 5.
	Oblinger '990 at, e.g., col. 9-10.
	Petersen '179 at, e.g., col. 13.
	Pitroda at col. 21.

Claim Language of '761 Patent	Invalidating Prior Art
	Pizi '258 at, e.g., col. 7-8.
	Salisbury '231 at, e.g., col. 9-10; fig. 1, 2.
	Salisbury '573 at, e.g., fig. 1, 3.
	Schroeter pp. 318-19.
	Seliger '648 at, e.g., col. 2, 8-9.
	Seliger '908 at, e.g., col. 2, 6, 10.
	Shea '938 at, e.g., col. 5, 11-13.
	Suchter '161 at, e.g., col. 8; fig. 3A-3B.
	Suchter '302 at, e.g., col. 8; fig. 3A-3B.
	Swartz '994 at, e.g., 1, 3, 6-9, 20.
	Terry '380 at, e.g., fig. 1.
	Thornton '429 at, e.g., abstract; col. 7-8, 13-15; fig. 1; claim 12.
	Zuberec '032 at, e.g., col. 4, 6-7.
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.	Belifore '513 at, e.g., col. 4, 19, 33, 43-45.
	Bellotti '409 at, e.g., abstract; pp. 2, 8; fig. 1, 9, 14-15.
	Bensimmon '678 at, e.g., pp. 2-3.
	Bly '853 at, e.g., col. 15.
	Brummel '220 at, e.g., col. 13.
	Chasen '721 at, e.g., col. 17.
	Chronaki at, e.g., pp. 260-61.
	Dourish '217 at, e.g., col. 11.
	Dourish '575 at, e.g., col. 3-9, figs. 1-7, passim (shared document repository for document sharing).
	Dourish Building Bridges at, e.g., 14-16, figs. 2-3 (all discussing document sharing).
	Dourish Presto at pp. 4, 6-7, 9-11.
	Edwards '076 at, e.g., col. 11.
	Edwards '553 at, e.g., col. 11; fig. 1, 2.
	Estrada '148 at, e.g., col. 8.

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

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

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

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

1}.

which the user environment was accessed from via a browser though 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, ll. 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.

1}.

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

By: _____

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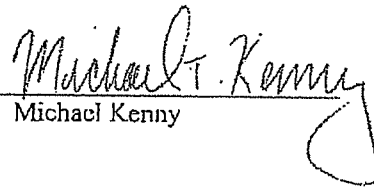
on the interested parties in this action by placing true and correct copies thereof enclosed in a sealed envelope addressed as follows (or as otherwise noted):

BY PERSONAL SERVICE:	BY MAIL:
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