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

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| LEADER TECHNOLOGIES, INC., a Delaware corporation,<br><br>Plaintiff and Counterdefendant,<br><br>v.<br><br>FACEBOOK, INC., a Delaware corporation,<br><br>Defendant and Counterclaimant. | Civil Action No. 1:08-cv-00862-JJF<br><br>**PUBLIC VERSION** |

**REDACTED EXHIBIT (D.I. No. 28) TO**
**DEFENDANT'S LETTER TO JUDGE FARNAN (D.I. #27)**

Dated: May 14, 2009

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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF DELAWARE**

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| LEADER TECHNOLOGIES, INC., a Delaware corporation, | ) | |
| | ) | Civil Action No. 08-862-JJF |
| Plaintiff-Counterdefendant, | ) | |
| | ) | **HIGHLY CONFIDENTIAL-- FOR ATTORNEY'S EYES ONLY** |
| v. | ) | |
| FACEBOOK, INC., a Delaware corporation, | ) | PUBLIC VERSION |
| Defendant-Counterclaimant | ) | |

**LEADER TECHNOLOGIES, INC.'S RESPONSES TO FACEBOOK, INC.'S FIRST SET OF INTERROGATORIES (1-9)**

REDACTED

REDACTED

REDACTED

REDACTED

REDACTED

**RESPONSES**

Subject to and without waiving the general objections, each of which is specifically incorporated into the specific Responses contained below, Leader hereby responds to Facebook's Interrogatories as follows:

**INTERROGATORY NO. 1:**

For each claim of the '761 Patent that LTI contends is infringed by any Facebook apparatus, product, device, process, method, act and/or other instrumentality (the "Accused Instrumentality"), identify each Accused Instrumentality and provide a chart identifying specifically where each limitation of each asserted claim is allegedly found within each Accused Instrumentality, including an explanation of how each such limitation is allegedly found literally or under the doctrine of equivalents, and for each element that Plaintiff contends is governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) that performs the claimed function.

**RESPONSE TO INTERROGATORY NO. 1:**

Leader objects to this Interrogatory to the extent it requires a legal interpretation or conclusion to which no response is required. Leader objects to this Interrogatory to the extent it seeks expert testimony. Leader objects to this Interrogatory to the extent it is premature because Facebook has not yet produced documents or responded to written discovery in the litigation. Leader objects to this Interrogatory to the extent it is premature, as the Court has not yet construed claim terms of the '761 Patent. Leader objects to this Request to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable law, privilege, doctrine, or immunity. Leader objects to this Interrogatory to the extent that it is compound amounting to multiple separate interrogatories because it is comprised of discrete subparts.

Subject to and without waiving the foregoing general and specific objections, Leader responds as follows: Leader asserts that the Facebook Website (as defined in its Leader's First Set of Requests for Documents and Things) literally infringes, or in the alternative, infringes under the doctrine of equivalents Claims 1-2, 4-5, 7-16, 21, 23-26, 29, and 31-34 of the '761 Patent. The following chart provides additional information regarding Facebook's infringement of the asserted claims.

| '761 Patent | Facebook Website |
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| The phrase "Facebook Website" as used below shall be afforded the definition set forth in Leader's First Set of Requests for Documents and Things to Facebook. The statements and documents cited below are solely provided by way of example and based on information available to Leader at the time this chart was created, and not to be used by way of limitation | |

| '766 Patent | Facebook Website |
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| or for purposes of construing the claim terms. Leader reserves its right to supplement this chart as additional information becomes known to it. | |
| 1. A computer-implemented network-based system that facilitates management of data, comprising: | The Facebook Website meets the recited claim language because it operates on a computer connected to a network and facilitates the management of data. |
| 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 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. | The Facebook Website meets the recited claim language because it uses a context component to capture context information associated with user-defined data in a first context of the Facebook Website. The Facebook Website stores the context information in metadata, and the user-defined data and metadata are stored on a storage component. The Facebook Website uses a tracking component for tracking a change of the user from the first context to a second context and dynamically updates the stored metadata based on the change where the user accesses the data from the second context.<br>By way of example, and not limitation, when a user of the Facebook Website logs on, the user is placed in an initial context. From this initial context, the user is given the ability to enter or upload data. When a user enters or uploads data to the Facebook Website, certain information concerning the data entry is collected by Facebook and automatically associated with the user's data. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. The Facebook Website uses a tracking component that uses individual "sessions" to track users as they move from context to context through the Facebook Website. The Facebook Website also tracks the actions of the user in each of the contexts. When a user accesses data that was entered or uploaded in a different context, certain information concerning those actions are collected by Facebook and associated with the accessed data. At least some of the tracking information is retrievable using API calls, |

| '761 Patent | Facebook Website |
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| | including, but not limited to Auth.getSession. The ability to access data from a different context is shown by screen-shots of the Facebook Website, including but not limited to LTI000781 to LTI000912. Additional information regarding the information maintained by Facebook may be found in LTI00037 to LTI000039, LTI000696 to LTI000697, LTI000363 to LTI000365, and LTI000696 to LTI000702. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 1 as described above, it also uses a component that captures and dynamically stores data created by interaction of a user, and the component is associated with a collection of data and application functionality related to the user-defined data.<br>By way of example and not limitation, when a user logs on to the Facebook Website and enters an initial context, the user is presented with a number of applications. These applications are described on the Facebook Website and are illustrated in screen-shots found in LTI000781 to LTI000912. Information regarding these applications may be found in LTI000705. It should be noted that these examples are not limiting and Leader intends to supplement its answer to this interrogatory once Leader has received Facebook's document production. |
| 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 | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 1 as described above, context information captured by a component |

| '761 Patent | Facebook Website |
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| environment. | of the Facebook Website includes the relationship between a user and at least one of an application, application data, and user environment.<br>By way of example, and not limitation, when a user enters or uploads data, the Facebook Website collects information about the user, application, application data and user environment. Example screen-shots of the Facebook Website illustrate that context information that is collected by Facebook includes relationships between a user, application, application data and user environment. These screen shots are illustrated in LTI000781 to LTI000912. Additional information may be found in LTI000363 to LTI000365. Again, Leader intends to supplement its response to this interrogatory once Facebook has provided Leader with it document production. |
| 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. | The Facebook Website meets the recited clam language because in addition to satisfying all the elements of Claim 1 as described above, it also uses a component that captures context information of a first user context and at least one other user context.<br>By way of example, and not limitation, when a user logs on to the Facebook Website, the initial context of the user also provides information of other contexts on the Facebook Website. Example screen-shots of the Facebook Website, which may be found in LTI000781 to LTI000912, illustrate that the context information captures and displays context information relating to other contexts. Additional information may be found in LTI000363 to LTI00365. Leader intends to supplement its response for this interrogatory once Facebook provides Leader with it document production. |
| 7. The system of claim 1, wherein data created in the first context is associated with data created in the second context. | The Facebook Website meets the recited clam language because in addition to satisfying all the elements of Claim 1 as described above, it also operates such that data created in the first |

| '761 Patent | Facebook Website |
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| | user context is associated with data created in a second user context.<br>By way of example, and not limitation, when a user enters or uploads data in a first context, that data is automatically updated in other contexts that are associated with the first context (and vice-versa). Example screen-shots of the Facebook Website found in LTI000781 to LTI000912 illustrate that data which is created in the first context is associated with data created in the second context. Additional information may be found in LTI000363 to LTI000365. Additional information for this interrogatory is currently in Facebook's possession, and Leader will supplement its response once this information is provided to Leader. |
| 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. | The Facebook Website meets the recited clam language because in addition to satisfying all the elements of Claim 1 as described above, context information is tagged to the user-defined data via the metadata when the user-defined data is created.<br>By way of example, and not limitation, when a user enters or uploads data to the Facebook Website, certain information regarding the data entry is collected by Facebook and tagged to the data entry. Example screen-shots of the Facebook Website illustrate that context information is tagged to the user-defined data. These screen shots may be found in LTI000781 to LTI000912 and LTI000363 to LTI00365. Leader intends to supplement its response once it has received Facebook's document production. |
| 9. A computer-implemented method of managing data, comprising computer-executable acts of: | The Facebook Website meets the recited claim language because it operates on a computer and uses a method of managing data carried out by acts on a computer. |
| 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 | The Facebook Website meets the recited claim language because it creates data within a user environment via user interaction with the user environment by a user using an |

| '761 Patent | Facebook Website |
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| 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 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. | application. The data is at least in the form of files and documents. The Facebook Website dynamically associates metadata with data which is stored on a storage component. The metadata includes, at least, information related to the user, the data, the application, and the user environment. The Facebook Website tracks the movement of the user from the user environment to a second user environment of the computer connected to the Internet. The Facebook Website dynamically updates the stored metadata with an association of the data, the application, and the second user environment where the user makes use of at least one of the application and the data from the second environment.<br>By way of example, and not limitation, when a user logs on to the Facebook Website, the user is provided a user environment which allows the user to enter or upload information. The Facebook Website creates data correlating to the information provided by the user and stores the data in a variety of forms, including files and documents. At least some of the data generated by the Facebook Website can be retrieved using API calls, including, but not limited to video.upload. Further, data created via user interaction is shown on example screen-shots of the Facebook Website which may be found in LTI000781 to LTI000912. When a user enters or uploads information and the Facebook Website creates corresponding data, the Facebook Website also collects certain information regarding the data. This includes information relating to the user, data, application and the user environment. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. This is also shown in example screen-shots from the Facebook Website provided which illustrate the metadata that is associated with the created data. The Facebook Website uses a tracking |

| '761 Patent | Facebook Website |
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| | component that uses individual "sessions" to track users as they move through the Facebook Website. At least some of the tracking information is retrievable using API calls, including, but not limited to Auth.getSession. When a user employs an application or data from a different environment from which the data was created, the Facebook Website collects information about the data, application and the user environment and associates the information with the employed data. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Example screen-shots, LTI000781 to LTI000912, from the Facebook Website illustrate examples of the updated metadata associated with the data. Additional examples and information regarding the Facebook Website can be found in LTI00174 to LTI00175, LTI000357 to LTI000365, LTI000696 to LTI000702, and LTI000037 to LTI000039. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 10. The method of claim 9, further comprising capturing context information of the user. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, it also captures information related to the user.<br>By way of example, and not limitation, when a user enters or uploads data, the Facebook Website collects information about the user. Moreover, when a user employs an application or data, the Facebook Website collects information about the user. Information about the user can be retrieved |

| '761 Patent Claim | Facebook Website |
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| | using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Additional information may be found at LTI000696 to LTI000697. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 11. The method of claim 9, further comprising indexing content of the user environment such that a plurality of users can access the content from an associated plurality of user environments. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, it also indexes the content of user environments such that users can access the content from other user environments.<br>By way of example, and not limitation, the Facebook Website allows users to access the data of other users from a variety of environments. A user can access the data of another user by obtaining, or searching for, information relating to the user, data, application or the user environment. Access is shown by example screen-shots of the Facebook Website which has been provided as LTI000781 to LTI000912. Additional information is illustrated in LTI000357 to LTI000365 and LTI000338 to LTI000339. Leader intends to supplement its response once Facebook has provided Leader with its document production. |
| 12. The method of claim 9, the least one of the data and the application is associated automatically with the second user environment. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, it also includes functionality that automatically associates at least one of the data and the application with the second user environment.<br>By way of example, and not limitation, when a user employs an application or data from a different environment from which the data was created, the Facebook Website collects |

| '761 Patent | Facebook Website |
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| | information about the user environment and automatically associates the information with the second user environment. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Example screen-shots from the Facebook Website, which may be found in LTI000781 to LTI000912, illustrate examples of the updated metadata associated with the data. Additional information may be found in LTI000696 to LSI000702 and LTI000357 to LSI000365. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 13. The method of claim 9, further comprising accessing the user environment and the second user environment using a browser. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, the user environments of the Facebook Website can be accessed through a browser.<br>By way of example, and not limitation, the Facebook Website, and the various environments it provides, is designed to be accessed using a browser. Example screen-shots illustrate that the Facebook Website is accessed using Internet Explorer and may be found in LTI000781 to LTI000912 and LTI000357 to LTI000365. |
| 14. The method of claim 9, further comprising communicating with the user environment using a TCP/IP communication protocol. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, communication with a user environment of the Facebook Website can occur via the Internet using a TCP/IP communication protocol.<br>By way of example, and not limitation, the Facebook Website, and the various |

| '761 Patent | Facebook Website |
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| | environments it provides, is designed to be accessed on the Internet which uses the TCP/IP protocol. Example screen-shots found at LTI000781 to LTI000912 and LTI000357 to LTI000365 illustrate that the Facebook Website is accessed over the Internet using Internet Explorer. |
| 15. The method of claim 9, further comprising locating the user environment from a remote location using a URL address. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, a user environment of the Facebook Website can be located from a remote location using a URL address.<br>By way of example, and not limitation, the Facebook Website, and the various environments it provides, is designed to be accessed using www.facebook.com. Example screen-shots, found at LTI000781 to LTI000912 and LTI000357 to LTI00365, illustrate that the Facebook Website is accessed using the URL www.facebook.com. |
| 16. The method of claim 9, further comprising accessing the user environment via a portable wireless device. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 9 as described above, a user environment of the Facebook Website can be accessed via a portable wireless device.<br>By way of example, and not limitation, the Facebook Website, and the various environments it provides, is designed to be accessed using mobile devices. The various platforms and applications which are designed specifically for mobile use are described on the Facebook Website, and can be found at LTI000703, LTI000255 to LTI000258 and LTI000276 to LTI000281. |
| 21. A computer-readable medium for storing computer-executable instructions for a method of managing data, the method comprising: | The Facebook Website meets the recited claim language because it operates from executing computer instructions which are stored on a computer-readable medium. The Facebook Website executes these instructions in order to manage of variety of data. |
| creating data related to user interaction of | The Facebook Website meets the recited |

| '761 Patent | Facebook Website |
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| 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. | claim language because data is created when a user uses an application of the Facebook Website. The Facebook Website dynamically associates metadata with the data and the data and metadata are stored on a web-based platform. The metadata includes information related to the user of the user workspace, to the data, to the application and to the user workspace. The Facebook Website tracks the movement of the user from the user workspace to a second user workspace. The Facebook Website dynamically associates 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. The Facebook Website indexes the data created in the user workspace such that a plurality of different users can access the data via the metadata from a plurality of different user workspaces.<br>By way of example, and not limitation, when a user logs on to the Facebook Website, the user enters a workspace with a variety of applications. Some of these applications allow the user to enter or upload information. The Facebook Website creates data correlating to the information provided by the user. At least some of the data generated by the Facebook Website can be retrieved using API calls, including, but not limited to video.upload. Further, data created via user interaction is shown on example screen-shots of the Facebook Website found in LTI000781 to LTI000912. When a user enters or uploads information and the Facebook Website creates corresponding data, the Facebook Website also collects certain information regarding the data. This includes information relating to the user, data, application and the user workspace. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Example screen-shots from the Facebook Website, found in LTI000781 to LTI000912, illustrate |

| '761 Patent | Facebook Website |
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| | the metadata that is associated with the created data. The Facebook Website uses a tracking component that uses individual "sessions" to track users as they move through the Facebook Website. At least some of the tracking information is retrievable using API calls, including, but not limited to Auth.getSession. When a user employs the data and the application used to create the data from a different workspace from which the data was created, the Facebook Website collects information about the workspace and associates the information with the employed data. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Example screen-shots from the Facebook Website illustrate examples of the updated metadata associated with the data which can be found in LTI000781 to LTI000912. The Facebook Website allows users to access the data of other users from a variety of workspaces. A user can access the data of another user by associating with, obtaining, or searching for, information relating to the user, data, application or the user workspace. Additional examples can be found in LTI00174 to LTI000175, LTI000357 to LTI000365, LTI000696 to LTI000702 and LTI000037 to LTI000039. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 23. A computer-implemented system that facilitates management of data, comprising: | The Facebook Website meets the recited claim language because it operates on a computer and facilitates management of data. |
| a computer-implemented context component of a web-based server for | The Facebook Website meets the recited clam language because it uses a context component |

| '764 Patent | Facebook Website |
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| defining a first user workspace 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. | for defining a first user workspace. The Facebook Website also assigns one or more applications to the first user workspace and captures context data associated with user interaction while the user is in the first user work space. Further, the Facebook Website dynamically stores the context data as metadata which is dynamically associated with data created in the first user workspace. The Facebook Website tracks change information associated with a change in access of the user from the first user workspace to a second user workspace, and dynamically stores the change information on the storage component as part of the metadata, wherein the user accesses the data from the second user workspace.<br>By way of example, and not limitation, when a user logs on to the Facebook Website, the user is placed in an initial context containing a workspace. From this initial context, the user is given the ability to enter or upload data using a variety of applications. When a user enters or uploads data to the Facebook Website, certain information concerning the data entry is collected by Facebook and automatically associated with the user's actions. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Facebook Website uses a tracking component that uses individual "sessions" to track users as they move through the Facebook Website. The Facebook Website also tracks when a user accesses data that was entered or uploaded in a different workspace. This tracking information is collected by Facebook and associated with the data that was accessed. At least some of the tracking information is retrievable using API calls, including, but not limited to Auth.getSession. The ability to enter and access data from different workspaces is shown by screen-shots of the Facebook Website which may be found in |

| '761 Patent | Facebook Website |
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| | LTI000781 to LTI000912. Additional information may be found in LTI000696 to LSI000702, LTI000037 to LTI000039, LTI000363 to LTI000365 and LTI000696 to LTI000697. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 24. The system of claim 23, wherein the tracking component automatically creates the metadata when the user accesses the first user workspace. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, it also includes a tracking component that automatically creates metadata when the user accesses the first user workspace.<br>By way of example, and not limitation, the Facebook Website automatically collects certain information concerning the actions of the users in each workspace. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Information relating to the API calls may be found in LTI000696 to LTI000702. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, it also captures relationship data associated with a relationship between the first user workspace and at least one other |

| '761 Patent | Facebook Website |
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| | user workspace.<br>By way of example, and not limitation, the Facebook Website automatically maintains information about each workspace and whether those workspaces are related to each other. At least some of this information is retrievable from the storage component using API calls, including, but not limited to, Users.setStatus and Users.getInfo. Information describing the API calls may be found in LTI00696 to LTI000702. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |
| 26. The system of claim 23, wherein the 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, it also includes an application associated with the first user workspace that is automatically accessible via the second user workspace when the user moves from the first user workspace to the second user workspace.<br>By way of example, and not limitation, an application that is associated in a user's workspace is automatically available on another user's workspace to the extent the second user workspace is associated with the first user workspace. The ability to access the application from different workspaces is shown by screen-shots of the Facebook Website which may be found in LTI000781 to LTI000912, LTI000363 to LTI000365 and LTI000705. Leader will supplement is answer to this interrogatory once Leader receives Facebook's document production. |
| 29. The system of claim 23, wherein when the data created in the first user workspace is accessed from the second user workspace, | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as |

| '176 Patent | Facebook Website |
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| in response to which the context component adds information to the metadata about the second user workspace. | described above, when the data created in the first user workspace of the Facebook Website is accessed from the second user workspace, the context component of the Facebook Website adds information to the metadata about the second user workspace.<br>By way of example and not limitation, the Facebook Website tracks when a user accesses data that was entered or uploaded in a different workspace. This tracking information is collected by Facebook and associated with the data that was accessed. The ability to access data from different workspaces is shown by screen-shots of the Facebook Website which may be found in LTI000781 to LTI000912, LTI00037 to LTI000039, LTI000363 to LTI000365, and LTI000696 to LTI000697. Additional information is available in Facebook's document production and Leader will supplement its answer once it receives the documents from Facebook. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, it also includes a storage component that stores the data and metadata according to at least one of a relational and an object storage methodology.<br>By way of example, and not limitation, the Facebook Website uses relational and object storage methodologies. For example, at least some of the data generated by the Facebook Website can be retrieved using FQL, which is a customized version of SQL. Some of this is illustrated on screen-shots of the Facebook website which can be found in LTI00174 to LTI00075 and LTI000357 to LTI000359. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to |

| '761 Patent | Facebook Website |
|---|---|
| | this interrogatory to identify the components which facilitate these processes. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, storing of the metadata in the storage component of the Facebook Website in association with data facilitates many-to-many functionality of the data via the metadata.<br>By way of example, and not limitation, the Facebook Website allows users to access the data of other users from a variety of contexts and workspaces. A user can access the data of another user by associating with, obtaining, or searching for, information relating to the user, data, application, user context or user workspace. Examples of screen shots illustrating this can be found in LTI000781 to LTI000912, LTI000338 to LTI000339 and LTI000363 to LTI000365. Leader intends to supplements its response to this interrogatory once Facebook provides its document production. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, a first user workspace of the Facebook 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.<br>By way of example, and not limitation, when a user logs on to the Facebook Website, the user has access to a variety of communication tools. At least one of these communications tools is email. Examples of screen shots can be found in LTI000781 to LTI000912, LTI000297 to LTI000298, LTI000304 to LTI000315 and LTI000740-41. Leader intends to supplement its response to this |

| '761 Patent | Facebook's Website |
|---|---|
| | interrogatory once it receives Facebook's document production. |
| 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. | The Facebook Website meets the recited claim language because in addition to satisfying all the elements of Claim 23 as described above, the applications used on the Facebook Website include file storage pointers that are dynamic and associated with the first user workspace.<br>By way of example, and not limitation, the Facebook Website uses file storage pointers which are dynamically updated. For example, at least some of the data generated by the Facebook Website can be retrieved using API calls, including, but not limited to photos.get. Information may also be found in examples of screen-shots found in LTI00174 to LTI00175 and LTI000357 to LTI00059. It should be noted that the citation to API calls in response to this interrogatory is to illustrate that this information is maintained by the Facebook Website. Once Leader has received Facebook's document production and source code, Leader will supplement its response to this interrogatory to identify the components which facilitate these processes. |

Leader's investigation of this matter is continuing and the Response to this Interrogatory will be supplemented as additional information becomes known to it.

**INTERROGATORY NO. 2:**

For each claim of the '761 Patent identified in response to Interrogatory No. 2, state the construction of each limitation of such claim and identify all intrinsic and extrinsic evidence that supports such construction.

REDACTED

REDACTED

**INTERROGATORY NO. 3:**

For each claim of the '761 Patent that LTI contends is infringed by Facebook, describe with particularity the circumstances surrounding the alleged invention of the claim, including, for example, the precise date of conception, the persons involved and the nature of their involvement, the date of actual or constructive reduction to practice, the date and circumstances of first experimental or test use, the date and circumstances of first public disclosure, the date and circumstances of the first offer to sell or sale, the steps constituting diligence from conception to actual or constructive reduction to practice, and all documents and evidence that Plaintiff contends corroborates any of the foregoing dates and/or diligence.

REDACTED

REDACTED

**INTERROGATORY NO. 4:**

Identify with particularity all evidence, documents and the complete factual basis of LTI's allegation of willful infringement, including, but not limited to, the precise circumstances by which notice (if any) of the '761 Patent was allegedly provided to Facebook prior to the filing of the Complaint in this action.

REDACTED

**INTERROGATORY NO. 5:**

Identify with particularity all evidence, documents and the complete factual basis of LTI's contention that Facebook has been knowingly and actively inducing others to allegedly infringe the '761 Patent and contributing to alleged infringement by others, including, without limitation, the identity of the persons whose infringement is or has been induced and/or contributed to and in what manner, and identify all persons with knowledge regarding the facts and evidence in support of such contentions.

REDACTED

REDACTED

**INTERROGATORY NO. 6:**

Identify every instance where any third party has been accused of infringing or put on notice of the '761 Patent, including the name and address of each third party and the circumstances surrounding the accusation.

REDACTED

**INTERROGATORY NO. 7:**

Identify and fully describe any and all damages that LTI is claiming in this suit, including all facts supporting LTI's contention that "Facebook's infringement of the '761 Patent has injured and continues to injure" LTI, the basis for any such damages, the dollar amount of any such damages, and the detailed methodology and calculations used to determine such amount.

REDACTED

REDACTED

**INTERROGATORY NO. 8:**

Identify with particularity all evidence, documents and the complete factual and legal bases upon which you base any contention that LTI is entitled to a permanent injunction against Facebook.

REDACTED

REDACTED

REDACTED

**INTERROGATORY NO. 9:**

For each claim of the '761 Patent that LTI contends is practiced by any product(s) and/or services of LTI, identify all such product(s) and/or service(s) and provide a chart identifying specifically where each limitation of each claim is found within such product(s) and/or service(s).

REDACTED

**REDACTED**

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*Attorneys for Plaintiff-Counterdefendant Leader Technologies, Inc.*

Dated: March 20, 2009
908101

**VERIFICATION**

I, Michael T. McKibben, Chairman and Founder of Leader Technologies, Inc., being duly sworn, deposes and says that I am authorized to sign this Verification and that I am informed and believe that the factual statements in **Plaintiff Leader Technologies, Inc.'s Responses to Facebook, Inc.'s First Set of Interrogatories ("Responses")** are true and correct to the best of my knowledge, information and belief. I declare under penalty of perjury under the laws of the State of Ohio and the United States that the above statement is true and correct.

March 20, 2009
Date

Michael T. McKibben

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

**CERTIFICATE OF SERVICE**

I, Philip A. Rovner, hereby certify that on March 20, 2009, true and correct copies of the within document were served on the following counsel of record, at the addresses and in the manner indicated:

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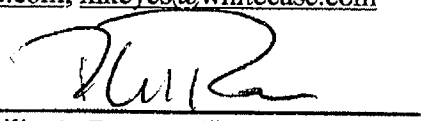

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