

EXHIBIT A1

Exhibit A1

Leader's statement of issues of fact and law that remain to be litigated¹

Leader submits the following facts remain to be litigated:

1. Whether Facebook literally infringes, or in the alternative, infringes under the Doctrine of Equivalents, claims 1, 4, 7, 9, 11, 16, 21, 23, 25, 31, and 32 of United States Patent No. 7,139,761 in violation of 35 U.S.C. §§ 271 (a)-(c).
2. The amount of damages adequate to compensate Leader for Facebook's infringement pursuant to 35 U.S.C. § 284.
3. Whether Leader is entitled to an accounting for all infringing sales, including all sales up until the entry of a final judgment, damages, costs, pre-judgment interest, post-judgment interest and injunctive relief.
4. Whether Facebook's infringement of any claim of United States Patent No. 7,139,761 was willful in violation of 35 U.S.C. § 284.
5. Whether this case is exceptional pursuant to 35 U.S.C. § 285, entitling Leader to an award of attorney fees.
6. Whether Leader is entitled to a permanent injunction pursuant to 35 U.S.C. § 283.
7. Whether Leader properly marked Leader2Leader with the '761 Patent.
8. Leader's opposition to Facebook's counterclaims and affirmative defenses.
9. Any other relief that the Court deems appropriate.

¹ In the event that claims are added to the case, Leader reserves its right to address the newly asserted claims and defend against them.