

EXHIBIT C2

Exhibit C2

Facebook's List of Potential Witnesses

The following is the list of witnesses that Facebook will call to testify at its case-in chief by person:

Witness Name and Title
Dr. Saul Greenberg, Invalidity Expert
Dr. Michael Kearns, Non-Infringement Expert
Christopher Bokhart, Damages Expert

In addition, the following is the list of witnesses that Facebook may call to testify at their case-in-chief, in person or by deposition (transcript and/or videographic):

Witness Name and Title
Michael Ackrell, Ackrell Capital
Lloyd Stephen Boord, Neyer Holdings Corp.
Sol Saad, Ladenburg Thalmann
Ryan Strong, IP Investments
James Sobwick, Chief Operations Officer of Leader
Tim Fathbruckner, Leader employee
Jeffrey R. Lamb, co-inventor
Jonathan Piurko, Northwater Capital Management
David Tierney, Marston Group Ltd.
Michael McKibben, Founder and Chief Executive Officer of Leader
Keith Voigts, former Chief Financial Officer of Leader

Riad Yammine, Member of the Board of Directors of Leader ¹
Steven Hanna, former Vice President of Technology of Leader
Elizabeth Foote Demarchi, former Leader employee
Eric Rosenberg, former Leader employee
Eric D. Jorgenson, prosecutor of U.S. Patent No. 7,139,761
Christopher K. Hess
J. Paul Dourish, University of California, Irvine
Laurence Hubert and/or Michel Gastado, Xerox Corp.
Corporate designee of Autonomy, Inc.
Ronald M. Swartz and/or Jeffrey L. Winkler and/or Evelyn A. Janos and/or Igor Markidan and/or Qun Dou, current or former employees of Xerox Corp.
L. Michael Martizen and/or Kiyo Niwa-San and/or Harold Aaron Ludtke, inventors of prior art
Josh Wiseman, Facebook employee
Cipora Herman, Vice President of Finance and Treasurer for Facebook
Daniel Chai, Facebook employee
Christopher Cox, Director of Product for Facebook

¹ Leader objects to Yammine, Hanna, Foote, Rosenberg, Jorgenson, Hess, Dourish, Hubert, Gastado, Corporate designees of Autonomy, Swartz, Winkler, Janos, Markidan, Dou, Martizen, Niwa-San, and Ludtke as witnesses at trial because these persons were not timely disclosed, would result in unfair surprise and prejudice to Leader and/or violates a stipulation agreed to by the parties that the testimony of these individuals would not be used in anyway in this case. Leader also objects on the same grounds to the corporate designee of Tudor Ventures, Berman, Moule, Corporate Designee of Shamrock Security, Solondz and Zacks unless their deposition is taken before trial.

Facebook notes that the stipulation referenced by Leader does not exist. Moreover, all of these individuals were properly disclosed in either written discovery served before the close of written discovery or in Facebook's supplemental Rule 26 disclosures, served before the end of deposition discovery. Leader's election not to take these depositions does not preclude Facebook from calling these witnesses at trial.

Andrew Bosworth, Facebook employee
Dan Rose, Vice President of Business Development for Facebook
Ruchi Sanghvi, Facebook employee
James Wang, Facebook employee
John Harrop, former Andrews Kurth attorney
David Washburn, Andrews Kurth
James Hughes, Inequitable Conduct Expert
Kimberly J. Felix, False Marking Expert
Corporate Designee of Tudor Ventures
Michael Berman, former employee of Platform Ventures
Scott Moule, former employee of Spartacom Technologies
Corporate Designee of Shamrock Security
Michael Solondz
Mark Zuckerberg, Chief Executive Officer of Facebook
Benjamin Zacks, Zacks Law Group