

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.

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) Civil Action No. 08-862-JJF-LPS
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PLAINTIFF LEADER TECHNOLOGIES, INC.'S
PROPOSED SPECIAL VERDICT FORM

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Dated: May 28, 2010

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

LEADER TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
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Plaintiff-Counterdefendant,)	Civil Action No. 08-862-JJF/LPS
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v.)	
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FACEBOOK, INC.,)	
a Delaware corporation,)	
)	
Defendant-Counterclaimant)	
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**PLAINTIFF LEADER TECHNOLOGIES, INC.'S
PROPOSED SPECIAL VERDICT FORM**

A. Leader Technologies' Patent Infringement Claims Against Defendant

Literal Infringement

1. Do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant directly and literally infringes any of the asserted claims of U.S. Patent No. 7,139,761?

YES _____ NO _____

[If you answered "Yes" to Question 1], please mark the claims you found to be infringed:

Claim 1: _____	Claim 4: _____	Claim 7: _____
Claim 9: _____	Claim 11: _____	Claim 16: _____
Claim 21: _____	Claim 23: _____	Claim 25: _____
Claim 31: _____	Claim 32: _____	

2. Do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant induced literal infringement of claims 9, 11, or 16 of U.S. Patent No. 7,139,761?

YES _____ NO _____

Claim 9: _____ Claim 11: _____ Claim 16: _____

3. Do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant contributed to the literal infringement of claims 9, 11, or 16 of U.S. Patent No. 7,139,761?

YES _____ NO _____

Claim 9: _____ Claim 11: _____ Claim 16: _____

Infringement Under The Doctrine of Equivalents

4. If you did not find that Defendant directly and literally infringes some or all of the claims of U.S. Patent No. 7,139,761 under Question 1 do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant infringe any of those claims under the doctrine of equivalents? **[Skip this question if you answered "Yes" and found literal infringement of all asserted claims of U.S. Patent No. 7,139,761 under Question 1]**

YES _____ NO _____

[If you answered "Yes" to Question 4], please mark the claims you found to be infringed under the doctrine of equivalents:

Claim 1: _____ Claim 4: _____ Claim 7: _____

Claim 9: _____ Claim 11: _____ Claim 16: _____

Claim 21: _____ Claim 23: _____ Claim 25: _____

Claim 31: _____ Claim 32: _____

5. If you did not find that Defendant induced literal infringement of some or all of the claims of U.S. Patent No. 7,139,761 under Question 2 do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant induced literal infringement any of those claims under the doctrine of equivalents? **[Skip this question if you answered "Yes" and found literal infringement of claims 9, 11, and 16 of U.S. Patent No. 7,139,761 under Question 2]**

YES _____ NO _____

[If you answered "Yes" to Question 5], please mark the claims you found to be infringed under the doctrine of equivalents:

Claim 9: _____ Claim 11: _____ Claim 16: _____

6. If you did not find that Defendant contributed to the literal infringement of some or all of the claims of U.S. Patent No. 7,139,761 under Question 3 do you find that Leader Technologies has proven by a preponderance of the evidence that Defendant contributed to the literal infringement any of those claims under the doctrine of equivalents? **[Skip this question if you answered "Yes" and found literal infringement of claims 9, 11, and 16 of U.S. Patent No. 7,139,761 under Question 3]**

YES _____ NO _____

[If you answered "Yes" to Question 6], please mark the claims you found to be infringed under the doctrine of equivalents:

Claim 9: _____ Claim 11: _____ Claim 16: _____

Willful Infringement

7. If you answered "Yes" to Questions 1, 2, 3, 4, 5, or 6 was Defendant's infringement willful?

YES _____ NO _____

B. Defendant's Patent Invalidation Claims Against Leader Technologies

Anticipation

8. Do you find that Defendant have proven by clear and convincing evidence that any of the asserted claims of U.S. Patent No. 7,139,761 are invalid because they are anticipated by prior art?

YES _____ NO _____

[If you answered "Yes" to Question 8], please identify the claims you found to be anticipated by prior art:

Claim 1: _____ Claim 4: _____ Claim 7: _____
Claim 9: _____ Claim 11: _____ Claim 16: _____
Claim 21: _____ Claim 23: _____ Claim 25: _____
Claim 31: _____ Claim 32: _____

Obviousness

9. Do you find that Defendant have proven by clear and convincing evidence that any of the asserted claims of U.S. Patent No. 7,139,761 are invalid because the prior art makes them obvious?

YES _____ NO _____

[If you answered "Yes" to Question 9], please identify the claims you found to be obvious:

Claim 1: _____ Claim 4: _____ Claim 7: _____
Claim 9: _____ Claim 11: _____ Claim 16: _____
Claim 21: _____ Claim 23: _____ Claim 25: _____
Claim 31: _____ Claim 32: _____

C. Damages for Leader Technologies' Patent Infringement Claims Against Defendant

10. If you have found that one or more of the asserted claims of U.S. Patent No. 7,139,761 are valid and infringed by Defendant, then what are the damages Leader Technologies has proven by a preponderance of the evidence?

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D. Defendant's False Marking Claim

11. Do you find that Defendant has proven by a preponderance of the evidence that Leader Technologies falsely marked the Leader2Leader® product with U.S. Patent No. 7,139,761?

YES _____

NO _____

FOREPERSON

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**IN THE UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on May 28, 2010, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM-ECF, HAND DELIVERY AND E-MAIL

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I hereby certify that on May 28, 2010 I have sent by E-mail the foregoing document to the following non-registered participants:

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