

EXHIBIT A1

Exhibit A1

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

Leader submits the following facts remain to be litigated:

1. Whether Facebook literally infringes, or in the alternative, infringes under the Doctrine of Equivalence, 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. Leader's opposition to Facebook's counterclaims and affirmative defenses.
3. Any other relief that the Court deems appropriate.