

EXHIBIT A2

Exhibit A2

Facebook's Statement of Issues of Fact that Remain To Be Litigated

Facebook submits the following issues of fact to be litigated:

1. Whether Leader has proved that Facebook infringes the '761 patent.
2. Whether the '761 patent is invalid for failure to meet one or more of the conditions of patentability specified in 35 U.S.C. §§ 101-103 and/or 112.
3. Whether Facebook is entitled to declaratory judgment under 28 U.S.C. §§ 2201 and 2202 of non-infringement of the '761 patent.
4. Whether Facebook is entitled to declaratory judgment of invalidity.