

# EXHIBIT B

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**PATENT APPLICATION**  
Attorney Docket No. D/A0A34

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Application of: Gregory T. Grefenstette et al.	)	
	)	Art Unit: 2172
Appl. No.: 09/683,235	)	
	)	Examiner: Isaac M. Woo
Filed: 12/05/2001	)	

Title: **SYSTEM FOR AUTOMATICALLY GENERATING QUERIES**

Commissioner for Patents  
BOX: NON-FEE AMENDMENT  
Washington, D.C. 20231

**AMENDMENT UNDER 37 C.F.R. 1.111**

Sir:

In response to the Office Action of December 23, 2002, please amend the above-identified application as follows (An Appendix submitted herewith sets forth a marked up version of any prior pending paragraphs(s) and/or claim(s) with additions shown with underlining (e.g., new text) and deletions shown with a strikethrough (e.g., ~~delete text~~) under 37 C.F.R. 1.121(b)(1)(iii) and 37 C.F.R. 1.121(c)(1)(ii), respectively.):

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**In the Specification:**

Please substitute the following paragraph(s) of the specification for their corresponding pending paragraphs(s) under 37 C.F.R. 1.121(b)(1):

1. Pending *Cross Reference To Related Applications* of the specification:

*AI*  
*IMW* Priority is claimed from U.S. Provisional Application No. 60/311,857, filed August 13, 2001. Cross-reference is made to U.S. Patent Application Serial No. 09/543,962, entitled "Meta-Document And Method Of Managing", and U.S. Patent Application Serial No. 09/928,619 entitled "Fuzzy Text Categorizer", which are both hereby incorporated herein by reference. In addition, cross-reference is made to the following U.S. Patent Applications that (a) are concurrently filed with this patent application, (b) are assigned to the same assignee as this patent application, (c) are incorporated in this patent application by reference, and (d) claim priority to U.S. Provisional Patent Application Serial No. 60/311,857, filed August 13, 2001: U.S. Patent Application Serial No. 09/683,238, entitled "Meta-Document Management System With Personality Identifiers"; U.S. Patent Application Serial No. 09/683,239, entitled "Meta-Document Management System With Document Identifiers"; U.S. Patent Application Serial No. 09/683,240, entitled "Meta-Document Management System With Transit Triggered Enrichment"; U.S. Patent Application Serial No. 09/683,241, entitled "System For Propagating Enrichment Between Documents"; U.S. Patent Application Serial No. 09/683,242, entitled "Document-Centric System With Auto-Completion And Auto-Correction"; U.S. Patent Application Serial No. 09/683,237, entitled "System With User Directed Enrichment And Import/Export Control"; U.S. Patent Application Serial No. 09/683,236, entitled "Meta-Document Management System With User Definable Personalities".

*09/02/03 Patented*  
*Pa. No. 6,772,040*  
*09/17/04 IMW*

2. Pending paragraph number 534:

*A2*  
The second action involves evaluating whether the personalities (i.e., P<sub>1,1</sub> to P<sub>1,i</sub>) specified in the exported meta-document file are standard personalities. This second

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A2

action is performed using properties that identify the personalities (e.g., name, creator, version number, unique identifier defined, for example, using the Digital Object Identifier standard, etc.). Standard personalities may, for example, be provided by software vendors and may be used by multiple systems. For all standard personalities, the exchange process matches the equivalent standard personalities from  $P_{2,1}$  to  $P_{2,n}$  to the personalities specified in the exported meta-document file. Identified matches are inserted into (or attached to) the new meta-document. Consequently, services and service providers associated with standard personalities are also inserted (or attached to), provided they correspond to services available at the importing meta-document server.

A3

3. Pending paragraph number 535:

The third action involves identifying "standalone services" that are specified outside a personality (i.e.,  $S_{1,1}$  to  $S_{1,j}$ ). Similar to personalities, the third action matches standard services available at the importing meta-document server using properties that identify the services in the exported meta-document file. Subsequently at this third action, these identified services are inserted (or attached to) in the new meta-document file. Consequently, any local dictionaries and strategies associated with these services are also inserted (or attached to), provided they correspond to dictionaries and strategies available at the importing meta-document server.

REMARKS

The Office Action of December 23, 2002 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested. Claims 1-20 are pending in this application. Of these, claims 1, 14, and 18 are independent claims.

This Amendment amends the specification to correct typographical errors and add patent application numbers of cross referenced patent applications that were not known at the time of filing and set forth as a comment in Applicant's transmittal letter.

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1. Response to Rejection Under 35 USC 103(a)

The Office Action on page 2 rejects claims 1-20 under 35 U.S.C. 103(a) as being unpatentable over Vu et al. (U.S. Patent No. 6,393,427, hereinafter referred to as Vu) in view of Myers et al. (U.S. Patent No. 6,374,274, hereinafter referred to as Myers). Applicant respectfully disagrees for the reasons discussed below.

Applicant's claimed invention is directed at a method, system, and article of manufacture for automatically generating a query, as described in detail in Applicant's specification in section F.3 (paragraph numbers 397-426). The system includes an entity extractor, a categorizer, and a query generator. The entity extractor identifies a set of entities in selected document content for searching information related thereto in an information retrieval system. The categorizer defines an organized classification of content with each class in the organization having an associated classification label that corresponds to a category of information in the information retrieval system.

Further in accordance with Applicant's invention, the categorizer assigns the selected document content a classification label from the organized classification of content. The query generator automatically formulates a query concerning the set of entities extracted by the entity extractor. In formulating the query, the query generator restricts the search at the information retrieval system to the category of information in the information retrieval system identified by the assigned classification label.

In contrast with Applicant's claimed invention, Vu discloses a method (operating on the client side) for constructing and maintaining (e.g., inserting and deleting documents from), a navigation tree based on existing document classifiers (see Col. 4, lines 19-21). The navigation tree is constructed adaptively to the size of the user's document collection on the client side from a classification tree returned from the existing document classifiers (see Col. 4, lines 29-31).

In further contrast with Applicant's claimed invention, Myers discloses a network database system with subscribing entities (e.g., user computers) that are authorized access to reliable sources of information. "Features that can be included in the system are customization of the documents to reflect sourcing by particular subscribers, automated formatting of the documents for storing in a network database, client access

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facilitated by subscriber-maintained databases, and the avoidance of cookies remaining on clients' computer hard drives following document access." (see Abstract).

Applicant respectfully submits that neither Vu nor Myers taken singly or in combination discloses Applicant's invention set forth in independent claims 1, 14, and 18. In particular, the sections of Vu cited in the Office Action at page 3, lines 3-7 that allegedly disclose the automatic formulation of a query as claimed by Applicant is not disclosed or suggested.

More specifically, the cited sections of Vu at page 3, lines 3-7 of the Office Action (i.e., col. 4, lines 55-67 to col. 5, lines 1-37) discloses a method for determining classification categories of a document that is introduced into a navigation tree. As set forth in col. 5, lines 6-14 of the cited section of Vu in the Office Action, keywords extracted from documents are used to query a classifier that determines what categories the documents belong to.

However, the Office Action fails to show that the cited section of Vu (i.e., col. 4, lines 55-67 to col. 5, lines 1-37) singly or in combination with Myers discloses or suggests Applicant's claimed invention in which a query is automatically formulated that restricts a search for information that concerns a set of entities identified in selected document content to a category of information at an information retrieval system, where the category, assigned to the selected document content, is identified by a classification label assigned from a classification of content where each classification label of the classification corresponds to a category in the information retrieval system.

Accordingly, Applicant respectfully submits that independent claims 1, 14, and 18 are patentably distinguishable over Vu taken singly or in combination with Myers. Insofar as claims 2-13, 15-17, and 19-20 are concerned, these claims depend from one of now presumably allowable independent claims 1, 14, and 18 and are also believed to be in allowable condition.

## 2. Fee Authorization And Extension Of Time

No additional fee is believed to be required for this Amendment. However, the undersigned Xerox Corporation attorney hereby authorizes the charging of any

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necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

3. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,

*Thomas Zell*

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Grenoble, France  
Date: 3/24/03

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