

## Appendix A

Defendants' Supplemental Prior Art Reference List  
(TC780-TC789)

to

TimeBase's Memorandum in Support of Its Motion  
for Summary Judgment of No Invalidity

TimeBase Pty Ltd v. The Thomson Corp. et al.  
DEFENDANTS' SUPPLEMENTAL PRIOR ART REFERENCE LIST – APPENDIX A

## **APPENDIX A**

### **DEFENDANTS' SUPPLEMENTAL**

### **PRIOR ART STATEMENT**

### **REFERENCE LIST**

Subject to the Court's claim construction, and given Defendants' understanding of Plaintiff's incomplete contentions regarding the construction and application of the claims, Defendants hereby supplement the Defendants' Prior Art Reference List (Appendix A) served October 23, 2009 as follows. These references anticipate under 35 U.S.C. § 102 and/or render obvious under 35 U.S.C. § 103 the asserted claims of the 6,233,592 and 7,293,228 patents.

To the extent that a reference is found not to anticipate a claim, the reference in combination with one or more of the other references listed herein renders the claim obvious to one of ordinary skill in the art in view of its explicit and implicit teachings, the prior art as a whole, the general knowledge of one of ordinary skill in the art, and the nature of the problem to be solved.

**PRINTED PUBLICATIONS:**

- 1) Agosti, M., Colotti, R., Gradenigo, G., "A Two-Level Hypertext Retrieval Model for Legal Data," (1991) ("Agosti 1991") [THOM00196683 – THOM00196692]
- 2) U.S. Patent No. 5,767,854, Anwar, M., "Multidimensional Data Display and Manipulation System and Methods for Using Same," (Sept. 27, 1996) ("Anwar 1996") [SAIC001665 – SAIC001717]
- 3) Arnold-Moore, T. & Sacks-Davis, R., "Databases of Legislation: The Problems of Consolidation," Collaborative Information Technology Research Institute, TR-94-9, July 4, 1994 ("Arnold-Moore 1994") [THOM00206435 – THOM00464]
- 4) Arnold-Moore, T., Fuller, M., Lowe, B., Thom, J., Wilkinson, R., "The ELF Data Model and SQL Query Language for Structured Document Database," (1994) ("Arnold-Moore 1994-2") [THOM00196608 – THOM00196617]
- 5) Arnold-Moore, T., "Automatically Processing Amendments to Legislation," 1995 ACM 0-89791-758-8/95/0005/0297 ("Arnold-Moore 1995") [THOM00196751 – THOM00196760]
- 6) Arnold-Moore, T., "Automatic Generation of Amendment Legislation," 1997 ACM 0-89791-924-6/97/96 ("Arnold-Moore 1997") [THOM00196521 – THOM00196527]
- 7) Arnold-Moore, T., Anderson, P., Sacks-Davis R., "Managing a Digital Library of Legislation," (1997) ("Arnold-Moore 1997-2") [THOM00196741 – THOM00196750]
- 8) Azaria, A., NETWORK WORLD, "SGML: a Lifesaver in a Sea Electronic Documents," (Dec. 12, 1994) ("Azaria 1994") [THOM00196790 – THOM00196791]
- 9) Bachman, C., "The Programmer as Navigator," (1973) ("Bachman 1973") [THOM00204044]

- THOM00204049]

- 10) Bentley, J., Friedman, J., "Data Structures for Range Searching," (1979) ("Bentley 1979") [THOM00204343 - THOM00204355]
- 11) Campbell, B., Goodman, J., "HAM: A General Purpose Hypertext Abstract Machine," (1988) ("Campbell 1988") [THOM00196867 - THOM00196872]
- 12) Caplinger, M., "Graphical Database Browsing," (1986) ("Caplinger 1986") [THOM00208979 - THOM00208987]
- 13) U.S. Patent No. 5,963,208, Dolan, M., "Integrated Network User Access User Interface for Navigating with a Hierarchical Graph," (July 14, 1998) ("Dolan 1998") [THOM00199967 - THOM00199993]
- 14) U.S. Patent No. 5,440,730, Elmasri, R., "Time Index Access Structure for Temporal Databases Having Concurrent Multiple Versions," (Aug. 9, 1990) ("Elmasri 1990") [THOM00210062 - THOM00210074]
- 15) U.S. Patent No. 5,892,513, Fay, R., "Intermediate Nodes for Connecting Versioned Subtrees in a Document Management System," (June 7, 1996) ("Fay 1996") [THOM00199940 - THOM00199945]
- 16) Haake, A., "CoVer: A Contextual Version Server for Hypertext Applications," Proceedings of the ACM ECHT Conference, Nov. 30-Dec. 4, 1992 ("Haake 1992") [THOM00195956-THOM00195965]
- 17) U.S. Patent No. 6,470,490, Hansen, V., "Contextual Data Representation and Retrieval Method" (Aug. 27, 1993) ("Hansen 1993") [SAIC001630 - SAIC001664]
- 18) Horne, Roger, "The Statute Law Database," (1997) ("Horne 1997") [THOM00195994 - THOM00195997]
- 19) Kim, H., Shin, H., Chang, J., "OOHS: An Object-Oriented Hypermedia System," Proceedings of the COMPSAC '96, 0730-3157/96 ("Kim 1996") [THOM00196548 - THOM00196553]
- 20) Kimball, R., "The Data Warehouse Toolkit: Practical Techniques for Building Dimensional Data Warehouses," (1996) ("Kimball 1996") [THOM00211947 - THOM00211995]
- 21) U.S. Patent No. 6,026,388, Liddy, E., "User Interface and Other Enhancements for Natural Language Information System Retrieval and Method," (Aug. 14, 1996) ("Liddy 1996") [THOM00199994 - THOM00200037]
- 22) Lo, C., "Integrating Links and Versioning in Document Management," (1995) ("Lo 1995") [THOM00207652 - THOM00207661]
- 23) Lo, C., "Link and Versioning Management in an SGML Based Document Management

- System,” (1996) (“Lo 1996”) [THOM00202985 – THOM00203208]
- 24) Noik, E., “Exploring Large Hyperdocuments: Fisheye Views of Nested Networks,” (1993) (“Noik 1993”) [THOM00197536 – THOM00197549]
- 25) Osterbye, K., “Structural and Cognitive Problems in Providing Version Control for Hypertext,” (1992) (“Osterbye 1992”) [THOM00197603 – THOM00197612]
- 26) U.S. Patent No. 5,740,425, Povilus, D., “Data Structure and Method for Publishing Electronic and Printed Product Catalogs,” (Sept. 26, 1995) (“Povilus 1995”) [THOM00210075 – THOM00210145]
- 27) Promenschenkel, G., “STEPS toward a new era in electronic publishing,” OCLC Newsletter No. 216, published by OCLC, July/August 1995 (“Promenschenkel 1995”) [THOM00196578 – THOM00196580]
- 28) Sacks-Davis, R., Arnold-Moore, T., Zobel, J., “Database Systems for Structured Documents,” (1994) (“Sacks-Davis 1994”) [THOM00198835 – THOM00198846]
- 29) Sacks-Davis, R., Kent, A., Ramamohanarao, K., Thom, J., Zobel, J., “Atlas: A Nested Relational Database System for Text Applications,” (1995) (“Sacks-Davis 1995”) [THOM00197969 – THOM00197985]
- 30) Sciore, E., “Multidimensional Versioning for Object-Oriented Databases,” Lecture Notes in Computer Science, Deductive and Object-Oriented Databases, Munich Germany (1991) (“Sciore 1991”) [THOM00209291 – THOM00209307]
- 31) Sciore, E., “Versioning and Configuration Management in an Object-Oriented Data Model,” VLDB Journal 3, 77-106 (1994) (“Sciore 1994”) [THOM00206121 – THOM00206150]
- 32) Stonebraker, M., Rowe, L., Hirohama, M., “The Implementation of Postgres,” (1990) (“Stonebraker 1990”) [THOM00203349 – THOM00203366]
- 33) Stonebraker, M., Chen, J., Nathan, N., Paxson, C., Wu, J., “Tioga: Providing Data Management Support for Scientific Visualization Applications,” 1994 IEEE Symposium on Visual Languages (1994) (“Stonebraker 1994”) [THOM00209213 – THOM00209226]
- 34) Taylor, C., Tudhope, D., Beynon-Davies, P., “Technical Briefing Representation and Manipulation of Conceptual Temporal and Geographical Knowledge in a Museum Hypermedia System,” (1994) (“Taylor 1994”) [THOM00198022 – THOM00198027]
- 35) Travis, B., Waldt, D., “The SGML Implementation Guide: A Blueprint for SGML Migration,” (1995) (“Travis & Waldt”) [THOM00204371 – THOM00204649]
- 36) U.S. Patent No. 6,144,962, Weinberg, A., “Visualization of Web Sites and Hierarchical Data Structures,” (April 11, 1997) (“Weinberg 1997”) [THOM00210146 – THOM00210190]
- 37) Wilkinson, R., Arnold-Moore, T., Fuller, M., Sacks-David, R., Thom, J., Zobel, J.,

"Document Computing: Technologies for Managing Electronic Document Collections," (1998) ("Wilkinson 1998") [SAIC00110 – SAIC00316]

- 38) Wilson, E., "Reference and Reference Inversion in Statutes and Cases: a Hypertext Solution," (1988) ("Wilson 1988") [THOM00197292 – THOM00197306]
- 39) Wilson, E., "Cases for Justus: Preparing a Case Database for a Hypertext Information Retrieval System," (1990) ("Wilson 1990") [THOM00197366 – THOM00197377]
- 40) Wilson, E., "Guiding Lawyers: Mapping Law into Hypertext," *Artificial Intelligence Review* 6, 161–89 (1992) ("Wilson 1992") [THOM00195912 – THOM00195940]
- 57) Larson, R., "Hypertext and Information Retrieval: Towards the Next Generation of Information Systems," (1988) ("Larson 1988") [THOM00221655 – THOM00221660]
- 58) Peltonen, H, Mannisto, T., Alho, K., Sulonen, R., "An Engineering Document Management System," (1993) ("Peltonen 1993") [THOM00221637 – THOM00221654]

**SYSTEMS:**

- 41) The Premise System as shown, for example, by the following documents ("Premise"):
- The Premise software ("Premise Software") [THOM00194621]
  - A sample Premise dataset: Annotated California Codes from 199X ("Premise Statutes") [THOM00194622–23]
  - Premise Publisher for Windows, User Manual ("Premise Publisher") [THOM00210191 – THOM00210579]
  - Premise Research Software for Windows, User's Guide ("Premise Research") [THOM00210580 – THOM00210844]
- 42) The Pre-1997 Westlaw and Westmate System as shown, for example, by the following documents ("Pre-1997 Westlaw/Westmate"):
- www.westlaw.com statutory databases from 1986–2001
  - "Westlaw DataBasics" (1993) ("DataBasics 1993") [THOM00211156 – THOM00211869]
  - Teply, L., "Legal Research and Citation," (1992) ("Teply 1992") [THOM00211117 – THOM00211155]
  - Johnson, N., Berring, R., Woxland, T., "Winning Research Skills," (1991) ("Johnson 1991") [THOM00211088 – THOM00211116]
  - "Password: Power Research," (May 1991) ("Password 1991") [THOM00211072 –

THOM00211087]

- “Westlaw Reference Manual” (1993) (“Westlaw Ref 1993”) [THOM00210996 – THOM00211071]
- Wren, C., Wren, J., “Using Computers in Legal Research: A Guide to LEXIS and WESTLAW,” (1994) (“Wren 1994”) [THOM00210845 – THOM00210954]
- Dozier, C., Morton, J., “Introduction to Westlaw Database File Organization,” (1991) (“Westlaw DB 1991”) [THOM00211870 – THOM00211904]
- AMPEX markup file for California Statute CA Bus & Prof Code § 2 (1996) (“AMPEX § 2”) [THOM00209405 – THOM00209407]
- Discovering Westlaw: The Essential Guide (1992) (“Essential Guide”) [THOM00210955 – THOM00210995]
- “WESTMATE 5.1 for Windows, User Manual,” (1993) (“WESTMATE User Guide 1993”) [THOM00221863 – THOM00221939]
- Discovering Westlaw: The Essential Guide (1996) (“Essential Guide 1996”) [THOM00221940 – THOM00222172]

43) The EnAct System (previously known as Themis) as shown, for example, by the following documents (“EnAct”):

- Arnold-Moore, T., Anderson, P., Sacks-Davis R., “Managing a Digital Library of Legislation,” (1997) (“Arnold-Moore 1997-2”) [THOM00196741 – THOM00196750]
- Arnold-Moore, T., “Information Systems for Legislation,” (thesis) (1998) (“Arnold-Moore Thesis”) [THOM00202745 – THOM00202984]
- Arnold-Moore, T., Clemes, J., Tadd, M. “Connected to the Law: Tasmanian Legislation Using EnAct,” 1999. (“Arnold-Moore 1999”) [THOM00210045 – THOM00210061]
- Arnold-Moore, T., “System Architecture: A Developer’s View,” (“Arnold-Moore A”) [TASGOVT000481 – TASGOVT000504]
- Cook, J., Arnold-Moore, T., Paice, S., “Legislation in Its Natural State,” SGML Asia-Pacific Conference (Sept. 25, 1996)
- CITRI Information, [SAIC001979 – 1995]
- McGhie, L., O’Sullivan, C., AUSTRALIAN LAW LIBRARIAN, “Tasmanian, Western Australian and Queensland Legislation on the Internet,” (June 1998) (“McGhie 1998”) [THOM00209372 – THOM00209376]
- RMIT, “Connected to the Law: Tasmanian Legislation Using EnAct,” (“RMIT 1”)

[TASGOVT00361 – TASGOVT00405]

- RMIT, “LSP Detailed Design Document,” (“RMIT 2”) [SAIC002489 – SAIC002606]
- Tadd, M., “A New Way of Looking at the Law: The EnAct Legislation System,” (“Tadd”) [TASGOVT000527 – TASGOVT000566]
- Tasmanian State Service, “Legislation System Project: Business Case,” (Nov. 14, 1994) (“TSS 1994”) [SAIC002910 – SAIC002986]
- Tasmanian State Service, “Legislation System Project: System Design Specification,” (Dec. 1994) (“TSS 1994-2”) [SAIC002746 – SAIC002909]
- Tasmanian State Service, “Legislation System Project: Functional Requirements Specification,” (Mar. 18, 1996) (“LSP: Functional Reqs”) [SAIC002489 – SAIC002745]
- Tasmanian State Service, “Legislative System Project Newsletter,” (June 1997) (“LSP Newsletter 1997”) (“TSS 1997”) [TASGOVT000742 – TASGOVT00744]
- Tasmanian State Service, “Legislative System Project Newsletter,” (Feb. 1998) (“LSP Newsletter 1998”) (“TSS 1998”) [TASGOVT006367 – TASGOVT006368]
- Screen Shots of EnAct, [TASGOVT000524 – TASGOVT000526]
- Wilkinson, R., Arnold-Moore, T., Fuller, M., Sacks-David, R., Thom, J., Zobel, J., “Document Computing: Technologies for Managing Electronic Document Collections,” (1998) (“Wilkinson 1998”) [SAIC00110 – SAIC00316]
- <http://www.thelaw.tas.gov.au> (and subpages, including help screens) (also including prior versions found on [www.archive.org](http://www.archive.org)) [THOM00213430 – THOM00213441]
- <http://web.archive.org/web/19981205075517/www.thelaw.tas.gov.au/start.html> [THOM00213421]
- <http://web.archive.org/web/19990430002036/www.thelaw.tas.gov.au/background.html> [THOM00213424 – THOM00213429]

44) The SCALEplus System as shown, for example, by the following documents (“SCALEplus”):

- ELI 1997 Conference Program (“ELI Program”) [THOM00208307 – THOM00208323]
- Kerr, P., Hoyle, A., Gilchrist, J., “An Introduction to Legal Resources on the Internet (2000) (“Kerr 2000”) [THOM00208324 – THOM00208516]
- SCALEplus User Manual (Version 3.0, Jan. 20, 1998) (“SCALEplus UM”) [THOM00209417 – THOM00209434]



- <http://www.austlii.edu.au/austlii/guide/current/20030315--6.html#Heading1298> [THOM00211924 – THOM00211935]
- SCALEplus User Manual (Version 3.0, Jan. 20, 1998) (“SCALEplus UM 2”) [THOM00221673– THOM00221747]
- SCALEplus Secrets [AUSAG000191 – AUSAG000194]

45) Documentum/Interleaf, as shown, for example, by the following documents (“Documentum”/”Interleaf”):

- Documentum LeafConnect for Interleaf (1996) (“Leafconnect 1996”) [THOM00196982 – THOM00196984]
- Interleaf 6 SGML (1995) (“Interleaf 6 1995”) [THOM00197307 – THOM00197310]
- Interleaf 6 Workgroup Tools (1995) (“Interleaf Workgroup 1995”) [THOM00197311 – THOM00197317]
- Interleaf 5 <SGML> User's Guide (1994) (“Interleaf UG 1994”) [THOM00203415 – THOM00203495]
- Interleaf Publisher (“Interleaf Publisher”) [THOM00203496 – THOM00203497]
- “Documentum Workspace” (Oct. 14, 1996) (“Documentum Workspace 1996”) [THOM00197040 – THOM00197042]
- “Documentum Announces First Industrial-Strength Product for Web Content Management: Documentum RightSite™ assembles current and individualized information for diverse user needs,” (Oct. 14, 1996) (“RightSite 1996”) [THOM00197037 – THOM00197039]
- Ovum Evaluation of Documentum (1996) (“Ovum Documentum 1996”) [THOM00196990 – THOM00197036]
- Ovum Evaluation of Interleaf (1996) (“Ovum Interleaf 1996”) [THOM00197318 – THOM00197351]
- De Mets, G., “Consleg Interleaf: SGML Applied in Legislation,” (1996) (“Consleg 1996”) [THOM00196897 – THOM00196902]

46) Astoria, as shown, for example, by the following documents (“Astoria”):

- “Astoria: Information Repository & Management Infrastructure,” (Apr. 1997) (“Astoria 1997-1”) [THOM00211905 – THOM00211912]
- “XSoft Premieres Document Component Management System,” (Mar. 1996) (“Astoria

1996”) [THOM00211913 – THOM00211915]

- “Chrystal Software Recognizes that Organizations Want to Reach Out to the Consumers of Their Document Information,” (1997) (“Astoria 1997-2”) [THOM00211916 – THOM00211917]
- “Astoria Delivers a Complete Document Management System that Offers Powerful Tools to Search, Edit, Share, and Track Documents and Their Components,” (1997) (“Astoria 1997-3”) [THOM00211918 – THOM00211920]
- XSoft, A Division of Xerox, Astoria (July 12, 1996), found at <http://xml.coverpages.org/duCharme-sgmlbms.html> [THOM00198647 – THOM00198649]
- XSoft Premieres Astoria; A Simpler Way to Manage ‘Mega-Documents’, from PR Newswire (March 12, 1996), found at <http://www.highbeam.com/doc/1G1-18079234.html> [THOM00198650 – THOM00198651]
- XSoft Astoria, found at <http://www.architag.com/tag/Article.asp?v=10&i=4&p=8&s=1> [THOM00198652 – THOM00198653]

47) Law Desk NY Official Reports, 2<sup>nd</sup> Series, Lawyers Cooperative Publishing (1995) (“NY Official Reports”) [THOM00213522 – THOM00213524]

48) New York Consolidated Laws Service, Lawyers Cooperative Pub. Co. (1992) (“NY CLS Beta”) [THOM00213530]

49) Social Security Plus, Version 1.1, Clark Broadman Callaghan (November 1994) (“Social Security Plus”) [THOM00213521]

50) RIA OnPoint CD-ROM Tax Library, Research Institute of America (1992) (“OnPoint”) [THOM00213529]

51) Core Materials on Legal Ethics: An Electronic Publication of the Legal Information Institute Cornell Law School, Cornell University (1995) (“Core Materials on Legal Ethics”) [THOM00213536]

52) New Mexico Law on Disk, The Michie Company (1991) (“New Mexico Law”) [THOM00213527]

53) Federal Rules of Civil Procedure, Cornell University (1995) (“Federal Rules of Civil Procedure”) [THOM00213532 – THOM00213533]

54) Uniform Commercial Code, Disk #1, Articles 1,2,3: An Electronic Publication of the Legal Information Institute of Cornell Law School (1995) (“UCC”) [THOM00213531]

55) Law Desk NY Official Reports, 2d Series, Lawyers Cooperative Publishing (1995) (“Law

Desk NY”) [THOM00213528]

56) Law Desk United States Code Service Titles 1-50, US Constitution, Court Rules, Tables, 4<sup>th</sup>  
Quarter 1995, Lawyers Cooperative Publishing (1995) (“Law Desk USCS”)  
[THOM00213525]

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