

Appendix G – Part 2

Defendants' Supplemental Prior Art Statement
'228 Patent
(TC1720-TC1749)

to

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

multidimensional space. A person of ordinary skill in the art would also have known how to create a computer system that would allow a user to select one of the portions of text-based data depicted on the graphical display, in order to retrieve that one related portion.

Claim 13

The following references (“The Claim 13 References”) disclose (explicitly or inherently) all of the limitations of claim 13 of the '228 patent, and therefore, each of the following references anticipates claim 13:

- Wilkinson 1998
- Wilson 1992
- Arnold-Moore Thesis
- The Premise System
- The Pre-1997 Westlaw/Westmate System
- The EnAct System

In addition, claim 13 of the '228 patent would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of those same references, either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claim 13 obvious:

- One or more of The Claim 13 References in combination with one or more of the following references: Essential Guide 1996, Agosti 1991, Anwar 1996, Arnold-Moore 1994, Arnold-Moore 1994-2, Arnold-Moore 1995, Arnold-Moore 1997, Arnold-Moore 1997-2, Bachman 1973, Bentley 1979, Campbell 1988, Elmasri 1990, Fay 1996, Haake 1992, Hansen 1993, Horne 1997, Kim 1996, Kimball 1996, Larson 1988, Lo 1995, Lo 1996, Osterbye 1992, Promenschenkel 1995, Sacks-Davis 1994, Sacks-Davis 1995, Sciore 1991, Sciore 1994, Stonebraker 1990, Stonebraker 1994, Taylor 1994, Travis & Waldt, Wilson 1988, Wilson 1990, The SCALEplus System, The CD-ROM-based Legal Publications, The Documentum/Interleaf System, The Astoria System

- The Essential Guide 1996 in view of Sciore 1994
- The Essential Guide 1996 in view of Kimball 1996
- The Essential Guide 1996 in view of Larson 1988
- The Pre-1997 Westlaw/Westmate System in view of Sciore 1994
- The Pre-1997 Westlaw/Westmate System in view of Kimball 1996
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- The Essential Guide 1996 in view of Arnold-Moore Thesis
- The Essential Guide 1996 in view of Lo 1996
- The Pre-1997 Westlaw/Westmate System in view of Arnold-Moore 1994
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- The Pre-1997 Westlaw/Westmate System in view of Arnold-Moore Thesis
- The Pre-1997 Westlaw/Westmate System in view of Lo 1996
- The Premise System in view of Arnold-Moore 1994
- The Premise System in view of Arnold-Moore 1997-2
- The Premise System in view of Arnold-Moore Thesis

- The Premise System in view of Lo 1996
- Wilson 1988 in view of Arnold-Moore 1994
- Wilson 1988 in view of Arnold-Moore 1997-2
- Wilson 1988 in view of Arnold-Moore Thesis
- Wilson 1988 in view of Lo 1996
- Wilson 1992 in view of Arnold-Moore 1994
- Wilson 1992 in view of Arnold-Moore 1997-2
- Wilson 1992 in view of Arnold-Moore Thesis
- Wilson 1992 in view of Lo 1996
- SCALEplus in view of Arnold-Moore 1994
- SCALEplus in view of Arnold-Moore 1997-2
- SCALEplus in view of Arnold-Moore Thesis
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- The Essential Guide 1996 in view of Sacks-Davis 1995
- The Essential Guide 1996 in view of Osterbye 1992
- The Pre-1997 Westlaw/Westmate System in view of Sacks-Davis 1995
- The Pre-1997 Westlaw/Westmate System in view of Osterbye 1992
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- The Premise System in view of Osterbye 1992
- Wilson 1988 in view of Sacks-Davis 1995
- Wilson 1988 in view of Osterbye 1992
- Wilson 1992 in view of Sacks-Davis 1995
- Wilson 1992 in view of Osterbye 1992
- SCALEplus in view of Sacks-Davis 1995
- SCALEplus in view of Osterbye 1992
- The Essential Guide 1996 in view of Arnold-Moore 1994 in further view of Sciore 1994
- The Essential Guide 1996 in view of Arnold-Moore 1997-2 in further view of Sciore 1994

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- The Essential Guide 1996 in view of Arnold-Moore Thesis in further view of Sciore 1994
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- The SCALEplus System in view of any of The Claim 13 References

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claim 1. In addition, one of ordinary skill in the art would have known how to create a computer system that allowed a user to search portions and amended portions of text-based data by using attributes of that data, the effective dates of the data, the contents of the data, or any combination thereof. Such a person would also have known how to create a system used for publishing legislation. One of ordinary skill in the art would also have known how to implement the system so that it displayed one or more portions of legislation that matched the user's search request. One of ordinary skill in the art would further know how to provide a computer user

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with a link to cases and to additional versions of the legislation and to allow the user to select one or both of those links. One of ordinary skill in the art would have also known how to display the related cases or additional versions upon a user's request.

Claim 36

The following references (“The Claim 36 References”) disclose (explicitly or inherently) all of the limitations of claim 36 of the '228 patent, and therefore, each of the following references anticipates claim 36:

- Arnold-Moore 1994
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Wilkinson 1998
- Wilson 1990
- Wilson 1992
- The Premise System
- The Pre-1997 Westlaw/Westmate System
- The EnAct System

In addition, claim 36 of the '228 patent would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of those same references, either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claim 36 obvious:

- One or more of The Claim 36 References in combination with one or more of the following references: Essential Guide 1996, Agosti 1991, Anwar 1996, Arnold-Moore 1994-2, Arnold-Moore 1995, Arnold-Moore 1997, Bachman 1973, Bentley 1979, Campbell 1988, Elmasri 1990, Fay 1996, Haake 1992, Hansen 1993, Horne 1997, Kim 1996, Kimball 1996, Larson 1988, Lo 1995, Lo 1996, Osterbye 1992, Promenschenkel 1995, Sacks-Davis 1994, Sacks-Davis 1995, Sciore 1991, Sciore 1994, Stonebraker 1990, Stonebraker 1994, Taylor 1994, Travis & Waldt, Wilson 1988, The SCALEplus System, The

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CD-ROM-based Legal Publications, The Documentum/Interleaf System, The Astoria System

- Any of the combinations of references listed above with respect to claim 13
- Any of the combinations of references listed above with respect to claim 13 in further view of Caplinger 1986
- The Premise System in view of any of The Claim 36 References
- The Pre-1997 Westlaw/Westmate System in view of any of The Claim 36 References
- The SCALEplus System in view of any of The Claim 36 References

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claims 1 and 13. In addition, one of ordinary skill in the art would have known how to create a computer system that would graphically display one or more related portions of text-based data to the user, including in such a way as to depict a multidimensional space. A person of ordinary skill in the art would also have known how to create a computer system that would allow a user to then select one of the portions of text-based data depicted on the graphical display, in order to retrieve that one related portion.

Claims 2, 14, 25, 37

The following references (“The 2/14/25/37 References”) disclose (explicitly or inherently) the limitations added by claims 2, 14, 25, and 37 of the ‘228 patent:

- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1997
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Bachman 1973
- Bentley 1979
- Campbell 1988

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- Elmasri 1990
- Haake 1992
- Horne 1997
- Kim 1996
- Lo 1996
- Sacks-Davis 1994
- Sacks-Davis 1995
- Sciore 1991
- Sciore 1994
- Stonebraker 1990
- Stonebraker 1994
- Taylor 1994
- Travis & Waldt
- Wilkinson 1998
- Wilson 1990
- Wilson 1992
- The Premise System
- The Pre-1997 Westlaw/Westmate System
- The SCALEplus System
- The Documentum/Interleaf System
- The EnAct System
- CD-ROM-based Legal Publications

To the extent these references anticipate claims 1, 13, 24, or 36, they also anticipate claims 2, 14, 25, and 37 of the '228 patent, respectively. To the extent The 2/14/25/37 References do not anticipate claims 2, 14, 25, and 37 of the '228 patent, these claims would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 2/14/25/37 References either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claims 2, 14, 25, and 37 obvious:

- One or more of The 2/14/25/37 References in combination with one or more of the following references: Essential Guide 1996, Agosti 1991, Anwar 1996,

Arnold-Moore 1995, Fay 1996, Hansen 1993, Kimball 1996, Larson 1988, Lo 1995, Osterbye 1992, Promenschenkel 1995, Wilson 1988, The Astoria System

- Any of the combinations of references listed above with respect to claim 1 render claim 2 obvious
- Any of the combinations of references listed above with respect to claim 13 render claim 14 obvious
- Any of the combinations of references listed above with respect to claim 24 render claim 25 obvious
- Any of the combinations of references listed above with respect to claim 36 render claim 37 obvious

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claims 1, 13, 24, and 36. In addition, one of ordinary skill in the art would have further known how to implement searching on electronic text-based information using attributes, where the attributes were coupled to the text-based information using indexes, pointers, identification codes, attributes, inverted-text files, offsets, or a variety of other mechanisms. It was well-known in the art that text-based information could be associated with attributes, either embedded in the text via a markup language, or stored externally, either in an index, a separate database, or other methods, and that both the content of the text and the attributes of the text could be searched. One of ordinary skill in the art would also have known how to use the coupling means listed above to retrieve the text-based information identified by the search. As described above, such persons also knew about using dimensions and attributes in a multidimensional space as a means for organizing portions or versions of text-based information.

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Claims 3, 4, 22, 23, 26, 27, 47, 48

The following references (“The 3/4/22/23/26/27/47/48 References”) disclose
(explicitly or inherently) the limitations added by claims 3, 4, 22, 23, 26, 27, 47, and 48 of
the ‘228 patent:

- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1997
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Azaria 1994
- Bachman 1973
- Bentley 1979
- Elmasri 1990
- Fay 1996
- Horne 1997
- Kim 1996
- Lo 1995
- Lo 1996
- Promenschenkel 1995
- Sacks-Davis 1994
- Sacks-Davis 1995
- Sciore 1991
- Sciore 1994
- Stonebraker 1994
- Travis & Waldt
- Wilkinson 1998
- The Premise System
- The Pre-1997 Westlaw/Westmate System

To the extent these references anticipate claims 1, 13, 24, or 36, they also anticipate
claims 3, 4, 22, 23, 26, 27, 47, and 48 of the ‘228 patent, respectively. To the extent The
3/4/22/23/26/27/47/48 References do not anticipate claims 3, 4, 22, 23, 26, 27, 47, and 48 of
the ‘228 patent, these claims would have been obvious to one of ordinary skill in the art of

the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 3/4/22/23/26/27/47/48 References either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claims 3, 4, 22, 23, 26, 27, 47, and 48 obvious:

- One or more of The 3/4/22/23/26/27/47/48 References in combination with one or more of the following references: Essential Guide 1996, Agosti 1991, Anwar 1996, Arnold-Moore 1995, Campbell 1988, Haake 1992, Hansen 1993, Kimball 1996, Larson 1988, Osterbye 1992, Stonebraker 1990, Taylor 1994, Wilson 1988, Wilson 1990, Wilson 1992, The EnAct System, The SCALEplus System, CD-ROM-based Legal Publications, The Documentum/Interleaf System, The Astoria System
- Any of the combinations of references listed above with respect to claim 1 render claims 3 and 4 obvious
- Any of the combinations of references listed above with respect to claim 1 in further view of Travis & Waldt render claims 3 and 4 obvious
- Any of the combinations of references listed above with respect to claim 13 render claims 22 and 23 obvious
- Any of the combinations of references listed above with respect to claim 13 in further view of Travis & Waldt render claims 22 and 23 obvious
- Any of the combinations of references listed above with respect to claim 24 render claims 26 and 27 obvious
- Any of the combinations of references listed above with respect to claim 24 in further view of Travis & Waldt render claims 26 and 27 obvious
- Any of the combinations of references listed above with respect to claim 36 render claims 47 and 48 obvious
- Any of the combinations of references listed above with respect to claim 36 in further view of Travis & Waldt render claims 47 and 48 obvious
- The SCALEplus System in view of any of The 3/4/22/23/26/27/47/48 References

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claim 1, 13, 24, and

36. In addition, one of ordinary skill in the art would have further known how to implement use SGML or XML to add structure, markup, attributes, and links to text-based information. Such a person would further know that use of a DTD is inherent with the use of SGML, and that a DTD provides the definitions for documents marked up with SGML or XML. Such a person would also know that use of a SSM is a common mechanism for defining the styles by which text-based information may be presented to a user or customer via various delivery mechanisms.

Claims 5, 6, 7, 15, 16, 17, 18, 28, 29, 30, 38, 39, 40, 41

The following references (“The 5/6/7/15/16/17/18/28/29/30/38/39/40/41 References”) disclose (explicitly or inherently) the limitations added by claims 5, 6, 7, 15, 16, 17, 18, 28, 29, 30, 38, 39, 40, and 41 of the '228 patent:

- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Campbell 1988
- Kim 1996
- Lo 1995
- Lo 1996
- Osterbye 1992
- Sacks-Davis 1994
- Sacks-Davis 1995
- Taylor 1994
- Travis & Waldt
- Wilkinson 1998
- Wilson 1992
- The Premise System
- The Pre-1997 Westlaw/Westmate System
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To the extent these references anticipate claims 1, 13, 24, or 36, they also anticipate claims 5, 6, 7, 15, 16, 17, 18, 28, 29, 30, 38, 39, 40, and 41 of the '228 patent, respectively. To the extent The 5/6/7/15/16/17/18/28/29/30/38/39/40/41 References do not anticipate claims 5, 6, 7, 15, 16, 17, 18, 28, 29, 30, 38, 39, 40, and 41 of the '228 patent, these claims would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 5/6/7/15/16/17/18/28/29/30/38/39/40/41 References either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claims 5, 6, 7, 15, 16, 17, 18, 28, 29, 30, 38, 39, 40, and 41 obvious:

- One or more of The 5/6/7/15/16/17/18/28/29/30/38/39/40/41 References in combination with one or more of the following references: Essential Guide 1996, Agosti 1991, Anwar 1996, Arnold-Moore 1995, Arnold-Moore 1997, Bachman 1973, Bentley 1979, Elmasri 1990, Fay 1996, Haake 1992, Hansen 1993, Horne 1997, Kimball 1996, Larson 1988, Promenschenkel 1995, Sciore 1991, Sciore 1994, Stonebraker 1990, Stonebraker 1994, Wilson 1988, Wilson 1990, The EnAct System, The SCALEplus System, The Documentum/Interleaf System, The Astoria System
- Any of the combinations of references listed above with respect to claim 1 render claims 5, 6, and 7 obvious
- Any of the combinations of references listed above with respect to claim 1 in further view of Travis & Waldt or in view of Folio Views Infobase Production Kit Utilities Manual, Version 3.1, Provo, Utah: Folio Corporation (June 1, 1994) render claims 5, 6, and 7 obvious
- Any of the combinations of references listed above with respect to claim 13 render claims 15, 16, 17, and 18 obvious
- Any of the combinations of references listed above with respect to claim 13 in further view of Travis & Waldt or in view of Folio Views Infobase Production Kit Utilities Manual, Version 3.1, Provo, Utah: Folio Corporation (June 1, 1994) render claims 15, 16, 17, and 18 obvious
- Any of the combinations of references listed above with respect to claim 24 render claims 28, 29, and 30 obvious

- Any of the combinations of references listed above with respect to claim 24 in further view of Travis & Waldt or in view of Folio Views Infobase Production Kit Utilities Manual, Version 3.1, Provo, Utah: Folio Corporation (June 1, 1994) render claims 28, 29, and 30 obvious
- Any of the combinations of references listed above with respect to claim 36 render claims 38, 39, 40, and 41 obvious
- Any of the combinations of references listed above with respect to claim 36 in further view of Travis & Waldt or in view of Folio Views Infobase Production Kit Utilities Manual, Version 3.1, Provo, Utah: Folio Corporation (June 1, 1994) render claims 38, 39, 40, and 41 obvious
- The SCALEplus System in view of any of The
5/6/7/15/16/17/18/28/29/30/38/39/40/41 References

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claim 1, 13, 24, and 36. In addition, one of ordinary skill in the art would have further known how to implement cross-references or links between portions of information or text-based data by adding information to the original text. Such a person would have known that links or cross-references could be implemented by using code or markup. Such a person would also have known how to associate each portion and amended portions of text-based data with an identification code and then to use those identification codes to create those cross-references or links between portions. One of ordinary skill would further know that creating a cross-reference or a link could involve identifying the source and the destination portions of text-based data, and that these cross-references or links could be in the form of static associations between portions or could alternatively be in the form of dynamic links or queries to identify the destination portion depending on the circumstances at run-time. One of ordinary skill

would know also that those links or cross references could be encoded with the text-based information, or could alternatively be stored external to the text-based information.

Claims 8, 31, 42

The following references (“The 8/31/42 References”) disclose (explicitly or inherently) the limitations added by claims 8, 31, and 42 of the ‘228 patent:

- Agosti 1991
- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1995
- Arnold-Moore 1997
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Bachman 1973
- Campbell 1988
- Fay 1996
- Haake 1992
- Horne 1997
- Kim 1996
- Lo 1995
- Lo 1996
- Osterbye 1992
- Promenschenkel 1995
- Sacks-Davis 1995
- Sciore 1991
- Sciore 1994
- Stonebraker 1990
- Taylor 1994
- Travis & Waldt
- Wilkinson 1998
- Wilson 1988
- Wilson 1990
- Wilson 1992
- The Premise System
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- The EnAct System

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- The SCALEplus
- CD-ROM-based Legal Publications
- The Documentum/Interleaf System

To the extent these references anticipate claims 1, 24, or 38, they also anticipate claims 8, 31, and 42 of the '228 patent, respectively. To the extent The 8/31/42 References do not anticipate, claims 8, 31, and 42 of the '228 patent, those claims would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 8/31/42 References either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claims 8, 31, and 42 obvious:

- One or more of The 8/31/42 References in combination with one or more of the following references: Essential Guide 1996, Anwar 1996, Bentley 1979, Elmasri 1990, Hansen 1992, Kimball 1996, Larson 1988, Sacks-Davis 1994, Stonebraker 1994, the Astoria System
- Any of the combinations of references listed above with respect to claim 1 render claim 8 obvious
- Any of the combinations of references listed above with respect to claim 24 render claim 31 obvious
- Any of the combinations of references listed above with respect to claims 36 or 38 render claim 42 obvious
- Any of The 8/31/42 References in combination with one or more of the following references: Anwar 1996, Bachman 1973, Bentley 1979, Elmasri 1990, Hansen 1993, Kimball 1996, Larson 1988, Lo 1996, Sciore 1991, Sciore 1994, Stonebraker 1994
- Any of The 8/31/42 References in combination with one or more of the following references: Wilson 1988, Wilson 1990, Wilson 1992

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claims 1, 24, 36 and

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38. In addition, one of ordinary skill in the art would have known how to add, delete, or modify the data within portions of text-based data.

Claims 9, 10, 11, 19, 20, 32, 33, 34, 43, 44, 45

The following references (“The 9/10/11/19/20/32/33/34/43/44/45 References”) disclose (explicitly or inherently) the limitations added by claims 9, 10, 11, 19, 20, 32, 33, 34, 43, 44, and 45 of the '228 patent:

- Agosti 1991
- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1995
- Arnold-Moore 1997
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Horne 1997
- Lo 1996
- Travis & Waldt
- Wilkinson 1998
- Wilson 1988
- Wilson 1990
- Wilson 1992
- The Premise System
- The Pre-1997 Westlaw/Westmate System
- The EnAct System
- The SCALEplus
- CD-ROM-based Legal Publications
- The Documentum/Interleaf System

To the extent these references anticipate claims 1, 15, 31, or 38, they also anticipate claims 9, 10, 11, 19, 20, 32, 33, 34, 43, 44, and 45 of the '228 patent, respectively. To the extent The 9/10/11/19/20/32/33/34/43/44/45 References do not anticipate claims 9, 10, 11, 19, 20, 32, 33, 34, 43, 44, and 45 of the '228 patent, these claims would have been obvious to

one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 9/10/11/19/20/32/33/34/43/44/45 References, either alone, or in combination with one another, or in combination with other references.

Indeed, claims 9, 10, 11, 19, 20, 32, 33, 34, 43, 44, and 45 are rendered obvious by all of the references and combinations of references listed above in conjunction with claims 1, 13, 15, 24, 31, 36, and 38 respectively. This is because one of ordinary skill in the art would have known that any of these references or combinations of references disclosed a system for publishing an electronic publication using text-based data containing portions of data that could contain legislation, provisions of legislation, or sections of legislation. One of ordinary skill in the art would know how to apply any of the systems disclosed by these references to the publishing of legislation, provisions or legislation, or sections of legislation.

Additionally, one of ordinary skill in the art would know how to make each portion of text-based data in a legislative publishing system a provision or section of legislation.

Claims 12, 21, 35, 46

The following references (“The 12/21/35/46 References”) disclose (explicitly or inherently) the limitations added by claims 12, 21, 35, and 46 of the '228 patent:

- Agosti 1991
- Arnold-Moore 1994
- Arnold-Moore 1994-2
- Arnold-Moore 1995
- Arnold-Moore 1997
- Arnold-Moore 1997-2
- Arnold-Moore Thesis
- Bachman 1973
- Bentley 1979
- Campbell 1988

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- Elmasri 1990
- Fay 1996
- Lo 1996
- Osterbye 1992
- Promenschenkel 1995
- Sacks-Davis 1994
- Sacks-Davis 1995
- Sciore 1994
- Stonebraker 1994
- Travis & Waldt
- Wilkinson 1998
- Wilson 1988
- Wilson 1990
- Wilson 1992
- The Premise System
- The Pre-1997 Westlaw/Westmate System
- The EnAct System
- The SCALEplus System
- The Documentum/Interleaf System
- CD-ROM-based Legal Publications

To the extent these references anticipate claims 1, 15, 24, or 38, they also anticipate claims 12, 21, 35, and 46 of the '228 patent, respectively. To the extent The 12/21/35/46 References do not anticipate, claims 12, 21, 35, and 46 of the '228 patent, those claims would have been obvious to one of ordinary skill in the art of the '228 patent (with the knowledge and common sense of one of ordinary skill in the art) in view of The 12/21/35/46 References either alone, or in combination with one another, or in combination with other references. For example, the following combinations of references render claims 12/21/35/46 obvious:

- One or more of The 12/21/35/46 References in combination with one or more of the following references: Essential Guide 1996, Anwar 1996, Haake 1992, Hansen 1993, Horne 1997, Kim 1996, Kimball 1996, Larson 1988, Lo 1995, Sciore 1991, Stonebraker 1990, Taylor 1994, The Astoria System

- Any of the combinations of references listed above with respect to claim 1 render claim 12 obvious
- Any of the combinations of references listed above with respect to claim 1 in further view of Travis & Waldt render claim 12 obvious
- Any of the combinations of references listed above with respect to claims 13 or 15 render claim 21 obvious
- Any of the combinations of references listed above with respect to claims 13 or 15 in further view of Travis & Waldt render claim 21 obvious
- Any of the combinations of references listed above with respect to claim 24 render claim 35 obvious
- Any of the combinations of references listed above with respect to claim 24 in further view of Travis & Waldt render claim 35 obvious
- Any of the combinations of references listed above with respect to claims 36 or 38 render claim 46 obvious
- Any of the combinations of references listed above with respect to claims 36 or 38 in further view of Travis & Waldt render claim 46 obvious

One of ordinary skill in the art would have had the same motivations for combining or modifying these references and systems described above with respect to claims 1, 13, 15, 24, 36, and 38. In addition, one of ordinary skill in the art would have known how to divide text-based data into portions smaller than the entire document and larger than a single word.