EXHIBIT N

to

Declaration of Heidi Keefe in Support of Facebook's Motion to Compel Further Production of Documents and Complete Interrogatory Responses

Cross Atlantic Capital Partners, Inc. v Facebook, Inc. and Thefacebook, LLC

USDC ED PA Case No. 07-CV-02768-JP

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CROSS ATLANTIC CAPITAL   :
PARTNERS, INC.   :
                                :
            Plaintiff,   :
        vs.   :   CIVIL ACTION
                                :   NO.: 07-CV-2768
FACEBOOK, INC.   :
  and   :   HON. JOHN R. PADOVA
THEFACEBOOK, LLC   :
                                :
            Defendants.   :

PLAINTIFF'S SUPPLEMENTAL RESPONSE
DEFENDANTS' SECOND SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, plaintiff Cross

Atlantic Capital Partners, Inc. ("XACP") hereby supplements its response to Defendants'

Interrogatories (Set 2) Directed to Plaintiff Cross Atlantic Capital Partners, Inc. as

follows:

GENERAL OBJECTIONS

1.   XACP adopts and incorporates by reference, as if fully set forth herein the

General Objections set forth in Plaintiff's previously served Responses to Defendants'

Interrogatories; Responses to Defendants' Requests For Production; and, Responses to

Defendants' Requests For Admissions.

SUPPLEMENTAL RESPONSES

Without waiver of the foregoing general objections and subject thereto, XACP

hereby supplements its responds to Defendants' Interrogatories (Set 2) Directed to

Plaintiff Cross Atlantic Capital Partners, Inc. as follows:

INTERROGATORY NO. 5

> 5.   For each claim of the '629 patent that you contend is entitled to the benefit of the filing date of
> U.S. Patent Application Ser. No. 09/264,988 (filed September 15, 1998) ("'988 Application"),
> identify with particularity any and all portions of the '988 Application that you contend disclose
> each limitation of each such claim.

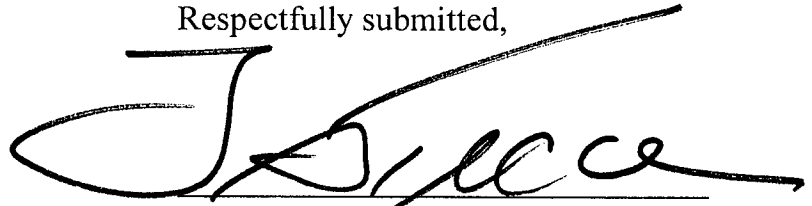## SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5

XACP adopts and incorporates by reference, its previously-provided specific

objections. XACP further objects to the subject interrogatory as premature to the extent

the response includes expert testimony, including, but not limited to, whether support for

the claims of the '629 Patent are inherently found in the '988 Application. The extent to

which any inherent support from the '988 Application for the elements of the claims of

the '629 Patent will be the subject of expert testimony, it will be disclosed by XACP on or

before the February 28, 2008 deadline for expert disclosures set forth in the Court's

Scheduling Order

Lastly, XACP objects and reserves it right under Rule 37(c) to move to strike

defendants' claims for failure to provide a substantive response to plaintiff's contention

interrogatories regarding the validity of the claims of the '629 Patent.

Subject to these specific objections, and the General Objections set forth above,

plaintiff supplements it response as follows:

Every element of every claim of the '629 Patent is supported by the written

description contained in the '988 Application. Representative (but not exclusive) support

is set forth in the attached Exhibit 1.

Respectfully submitted,

Dated: January 15, 2008

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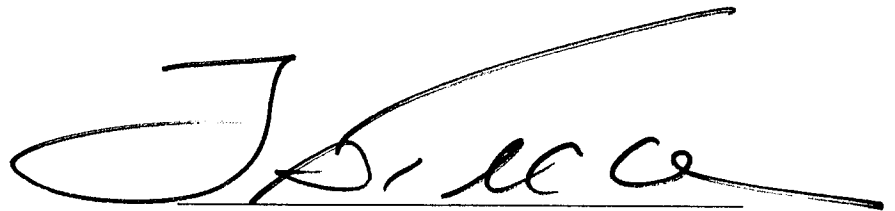Counsel for plaintiff
Cross Atlantic Capital Partners, Inc.

CERTIFICATE OF SERVICE

This is to certify that on this 15th day of January, 2007, I caused a true and correct

copy of the foregoing Plaintiff's Supplemental Response to Defendants' Interrogatories

(Second Set) to be served, *via first class mail, postage pre-paid,* upon the following:

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Facebook, Inc. and Thefacebook, LLC

Frederick A. Tecce

1. A method for creating a community for users with common interests to interact in, the method comprising the steps of:	"[T]his invention relates to the use of various communications protocols in order to distribute and enable applications and information through a public or private network. It is a still further object of the present invention to provide a method for multi-user interaction through a communications network which is directed to a specific transaction, interaction and/or application. The present invention is next described in the context of a system for distributing, initiating and controlling computer games. This discussion is provided for illustrative purposes only in that IADS 100 may be employed in the distribution, initiation and/or control of a practically infinite number of applications as well as with a variety of communications functions and not just with respect to the particular embodiment described herein.
receiving a creation transmission from a registered user, the creation transmission indicating that the registered user desires to create a community;	In either case, on the user's first visit, the user is prompted to register, and does register with the service via central controller at steps 535 and 540 so that information can be gathered as necessary prior to game play.

receiving community identification information from the registered user;	The IADS operates, in one embodiment, to distribute, initiate and allow the play of multi-player games *via* the Internet. A registration form (or other means for providing the requested information) is completed by the user and may then be sent by client 110 to central controller 115 at step 545.
receiving a selection of at least one application object from the registered user;	The user next enters the lobby at step 570. The lobby is a chat room where the user can select, via various buttons, hyperlinks, pull down menus, etc, other chat rooms and/or the application/game in which the user wishes to participate."

creating a community based on the community identification information and the at least one application object;	Upon a user's decision to play a game, a small distribution and play application, which is a component of the application object will be initiated.
	The user next enters the lobby at step 570 . . where the user can select . . the applications/games in the user wishes to participate.
	For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room.
	Once the invocation procedures have been completed the users may participate in coordinated game play at step 440 under the control of central controller 115. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.

receiving at least one communications address designated by the registered user, the at least one communications address corresponding to a user to receive a created community; and transmitting the created community based in part on the at least one communications address.	Alternatively, if the user desires, he or she can designate email addresses (as well as possibly some additional data) for potential new users at step 5185. The user can also designate games and/or other applications which may be of interest to the potential user. The email addresses and other information are collected by the central controller at step 5190, which then may store the data in inquiry database 360 or some other database. Following this, an application object with the designated games (and/or other applications) may be emailed to designated potential users 5205.

2. The method according to claim **1**, wherein the step of transmitting the created community further comprises transmitting the created community and a user interface.	The IADS of the present invention employs known Internet protocols . . to distribute and initiate computer games such that the application's executable and information concerning virtual locations for application interaction are automatically installed on a local computer. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. In order to provide multiple player game play through the internet 150 under the control of central controller115, a number of steps take place. Those skilled in the art would recognize that control could alternatively be accomplished through a peer-to-peer network or through other communications links.
3. The method according to claim **1**, wherein the at least one communications address is an e-mail address.	In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code . . .

4. The method according to claim **1**, wherein the selected at least one application object comprises at least one of: a)chat application object; b) an instant message application object; c) a white board application object; d) a shopping cart application object; e) an invitation application object; f) a creation application object; g) a photo album application object; h) a store application object; i) a calendar application object; j) a video conferencing application object; k) a voice chat application object; l) an e-mail list application object; m) a bulletin board application object; and n) a pals application object.	The '988 Application discloses application objections throughout.

5. The method according to claim 1, further comprising the step of receiving a selection to subscribe to at least one subscription object, wherein the at least one subscription object is accessed through one of the at least one application object.	It is another object of the present invention to enable the distribution of computer software, including computer games, through electronic mail, the Internet and other channels of electronic communication

It is still another object of the present invention to provide a means for distributing, promoting and enabling the play of computer software games among multiple users in a multiple player game environment. |

6. The method according to claim **5**, wherein the at least one subscription object is published by at least one of: a) at least one other community; b) at least one other user; and c) at least one vendor.	Alternatively, players may locate each other through pre-arranged bulletin boards or through email exchanges. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. In order to provide multiple player game play thought the Internet 150 under the control of central controller 115, a number of steps take place. Those skilled in the art will recognize that control could alternatively be accomplished through a peer-to-peer network or though other communications links. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game. At step 415, after the connection has been established, central controller 115 may request particular information from the user prior to initiating any further activity. The information request may include a request for personal information or other information which my be useful in marketing the application (e.g. computer game).

9. A system for creating a community for users with common interests to interact in comprising:	"[T]his invention relates to the use of various communications protocols in order to distribute and enable applications and information through a public or private network. It is a still further object of the present invention to provide a method for multi-user interaction through a communications network which is directed to a specific transaction, interaction and/or application. The present invention is next described in the context of a system for distributing, initiating and controlling computer games. This discussion is provided for illustrative purposes only in that IADS 100 may be employed in the distribution, initiation and/or control of a practically infinite number of applications as well as with a variety of communications functions and not just with respect to the particular embodiment described herein.
a receiver module for receiving:	central controller
a) a creation transmission from a registered user, the creation transmission indicating that the registered user desires to create a community;	In either case, on the user's first visit, the user is prompted to register, and does register with the service via central controller at steps 535 and 540 so that information can be gathered as necessary prior to game play.

b) receiving community identification information from the registered user;	The IADS operates, in one embodiment, to distribute, initiate and allow the play of multi-player games *via* the Internet. A registration form (or other means for providing the requested information) is completed by the user and may then be sent by client 110 to central controller 115 at step 545.
c) receiving a selection of at least one application object from the registered user; and	The user next enters the lobby at step 570. The lobby is a chat room where the user can select, via various buttons, hyperlinks, pull down menus, etc, other chat rooms and/or the application/game in which the user wishes to participate."
d) at least one communications address designated by the registered user, the at least one communications address corresponding to a user to receive a created community;	First, at step 400, the process is initiated. In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code and the invoking functionality (the "application object") in the form described below.

a creation module for creating a community based on the community identification information and the at least one community function;	The IADS operates, in one embodiment, to distribute, initiate and allow the play of multi-player games *via* the Internet. Upon a user's decision to play a game, a small distribution and play application, which is a component of the application object will be initiated. The user next enters the lobby at step 570 . . where the user can select . . the applications/games in the user wishes to participate. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. Once the invocation procedures have been completed the users may participate in coordinated game play at step 440 under the control of central controller 115. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.
and a transmitter for transmitting the created community based in part on the at least one communications address.	central controller 115

10. The system according to claim **9**, wherein transmitting the created community comprises transmitting the created community and a user interface.	The IADS of the present invention employs known Internet protocols . . to distribute and initiate computer games such that the application's executable and information concerning virtual locations for application interaction are automatically installed on a local computer. In order to provide multiple player game play through the internet 150 under the control of central controller115, a number of steps take place. Those skilled in the art would recognize that control could alternatively be accomplished through a peer-to-peer network or through other communications links.
11. The system according to claim **9**, wherein the at least one communications address is an e-mail address.	In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code . . .

12. The system according to claim **9**, wherein the selected at least one application object comprises at least one of:	The '988 Application discloses application objections throughout.
a) chat application object;	
b) an instant message application object;	
c) a white board application object;	
d) a shopping cart application object;	
e) an invitation application object;	
f) a creation application object;	
g) a photo album application object;	
h) a store application object;	
i) a calendar application object;	
j) a video conferencing application object;	
k) a voice chat application object;	
l) an e-mail list application	

13. The system according to claim **9**, further comprising a subscription module for subscribing to at least one subscription object, wherein the at least one subscription object is accessed through one of the at least one application object.	It is another object of the present invention to enable the distribution of computer software, including computer games, through electronic mail, the Internet and other channels of electronic communication It is still another object of the present invention to provide a means for distributing, promoting and enabling the play of computer software games among multiple users in a multiple player game environment.

14. The method according to claim **13**, wherein the at least one subscription object is published by at least one of: a) at least one other community; b) at least one other user; and c) at least one vendor.	Alternatively, players may locate each other through pre-arranged bulletin boards or through email exchanges. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. In order to provide multiple player game play thought the Internet 150 under the control of central controller 115, a number of steps take place. Those skilled in the art will recognize that control could alternatively be accomplished through a peer-to-peer network or though other communications links. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game. At step 415, after the connection has been established, central controller 115 may request particular information from the user prior to initiating any further activity. The information request may include a request for personal information or other information which my be useful in marketing the application (e.g. computer game).

17. A method for creating a community for users with common interests to interact in, the method comprising the steps of:	"[T]his invention relates to the use of various communications protocols in order to distribute and enable applications and information through a public or private network. It is a still further object of the present invention to provide a method for multi-user interaction through a communications network which is directed to a specific transaction, interaction and/or application. The present invention is next described in the context of a system for distributing, initiating and controlling computer games. This discussion is provided for illustrative purposes only in that IADS 100 may be employed in the distribution, initiation and/or control of a practically infinite number of applications as well as with a variety of communications functions and not just with respect to the particular embodiment described herein.
transmitting a creation transmission, the creation transmission indicating the desire to create a community;	In either case, on the user's first visit, the user is prompted to register, and does register with the service via central controller at steps 535 and 540 so that information can be gathered as necessary prior to game play.
transmitting community identification information;	A registration form (or other means of providing the requested information) is completed by the user and may be sent by client 110 to central controller 115 at step 545.

transmitting at least one communications address corresponding to a user to receive the created community; and	First, at step 400, the process is initiated. In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code and the invoking functionality (the "application object") in the form described below.

selecting at least one application object for inclusion in the community, whereby the community is created based on the community identification information and the at least one application object.	The IADS operates, in one embodiment, to distribute, initiate and allow the play of multi-player games *via* the Internet. Upon a user's decision to play a game, a small distribution and play application, which is a component of the application object will be initiated. The user next enters the lobby at step 570 . . where the user can select . . the applications/games in the user wishes to participate. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. Once the invocation procedures have been completed the users may participate in coordinated game play at step 440 under the control of central controller 115. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.

18. The method according to claim **17**, wherein the created community includes a user interface.	In order to provide multiple player game play through the internet 150 under the control of central controller115, a number of steps take place. Those skilled in the art would recognize that control could alternatively be accomplished through a peer-to-peer network or through other communications links.
19. The method according to claim **17**, wherein the at least one communications address is an e-mail address.	In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code . . .

20. The method according to claim **17**, wherein the selected at least one application object comprises at least one of:
 	
    a)   chat application object;
 	
    b)   an instant message application object;
 	
    c)   a white board application object;
 	
    d)   a shopping cart application object;
 	
    e)   an invitation application object;
 	
    f)   a creation application object;
 	
    g)   a photo album application object;
 	
    h)   a store application object;
 	
    i)   a calendar application object;
 	
    j)   a video conferencing application object;
 	
    k)   a voice chat application object;
 	
    l)   an e-mail list application
	The '988 Application discloses application objections throughout.

21. The method according to claim **17**, further comprising the step of subscribing to at least one subscription object for inclusion in the community, wherein the at least one subscription object is accessed through one of the at least one application object.	It is another object of the present invention to enable the distribution of computer software, including computer games, through electronic mail, the Internet and other channels of electronic communication It is still another object of the present invention to provide a means for distributing, promoting and enabling the play of computer software games among multiple users in a multiple player game environment.

22.   The method according to claim **21**, wherein the at least one subscription object is published by at least one of:
 	
    a)   at least one other community;
 	
    b)   at least one other user; and
 	
    c)   at least one vendor.
	Alternatively, players may locate each other through pre-arranged bulletin boards or through email exchanges.
	
	For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room.
	
	In order to provide multiple player game play thought the Internet 150 under the control of central controller 115, a number of steps take place. Those skilled in the art will recognize that control could alternatively be accomplished through a peer-to-peer network or though other communications links.
	
	It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.
	
	At step 415, after the connection has been established, central controller 115 may request particular information from the user prior to initiating any further activity. The information request may include a request for personal information or other information which my be useful in marketing the application (e.g. computer game).

25. A system for creating a community for users with common interests to interact in, the system comprising:	"[T]his invention relates to the use of various communications protocols in order to distribute and enable applications and information through a public or private network. It is a still further object of the present invention to provide a method for multi-user interaction through a communications network which is directed to a specific transaction, interaction and/or application. The present invention is next described in the context of a system for distributing, initiating and controlling computer games. This discussion is provided for illustrative purposes only in that IADS 100 may be employed in the distribution, initiation and/or control of a practically infinite number of applications as well as with a variety of communications functions and not just with respect to the particular embodiment described herein. ('988 Application at 9).
a transmitter module for transmitting:	central controller 115
a) a creation transmission, the creation transmission indicating the desire to create a community;	In either case, on the user's first visit, the user is prompted to register, and does register with the service via central controller at steps 535 and 540 so that information can be gathered as necessary prior to game play.

b) community identification information;	A registration form (or other means for providing the requested information) is completed by the user and may then be sent by client 110 to central controller 115 at step 545.
c) at least one communications address corresponding to a user to receive the created community; and	First, at step 400, the process is initiated. In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code and the invoking functionality (the "application object") in the form described below.

d) a selection of at least one application object for inclusion in the community, whereby the community is created based on the community identification information and the at least one application object;	The IADS operates, in one embodiment, to distribute, initiate and allow the play of multi-player games *via* the Internet. Upon a user's decision to play a game, a small distribution and play application, which is a component of the application object will be initiated. The user next enters the lobby at step 570 . . where the user can select . . the applications/games in the user wishes to participate. For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room. Once the invocation procedures have been completed the users may participate in coordinated game play at step 440 under the control of central controller 115. It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.

and a display module for displaying prompts for the community identification information, the at least one communications address, and the selection of at least one application object.	Assuming the user has been authorized and is determined to maintain a local copy of the application, client 110 may be instructed by the central controller 115 to download art and/or other supporting files such as graphics, game engines, audio files, etc for the selected game/application (step 575). Particular files, characters and game elements may also be cached locally at client 110 for rapid access during play.
26. The system according to claim **25**, wherein the created community includes a user interface.	In order to provide multiple player game play through the internet 150 under the control of central controller115, a number of steps take place. Those skilled in the art would recognize that control could alternatively be accomplished through a peer-to-peer network or through other communications links.
27. The system according to claim **25**, wherein the at least one communications address is an e-mail address.	In step 405, the user in question is sent (to PC 210 for example) an email containing the application/object code . . .

28. The system according to claim **25**, wherein the selected at least one application object comprises at least one of:	The '988 Application discloses application objections throughout.
a) chat application object;	
b) an instant message application object;	
c) a white board application object;	
d) a shopping cart application object;	
e) an invitation application object;	
f) a creation application object;	
g) a photo album application object;	
h) a store application object;	
i) a calendar application object;	
j) a video conferencing application object;	
k) a voice chat application object;	
l) an e-mail list application object;	
m) a bulletin board application object; and	
n) a pals application object.	

29. The system according to claim **25**, wherein the transmitter module further transmits the selection of subscribing to at least one subscription object for inclusion in the community, wherein the at least one subscription object is accessed through one of the at least one application object.	It is another object of the present invention to enable the distribution of computer software, including computer games, through electronic mail, the Internet and other channels of electronic communication It is still another object of the present invention to provide a means for distributing, promoting and enabling the play of computer software games among multiple users in a multiple player game environment.

30. The system according to claim **29**, wherein the at least one subscription object is published by at least one of:
 	
    a)   at least one other community;
 	
    b)   at least one other user; and
 	
    c)   at least one vendor.
	Alternatively, players may locate each other through pre-arranged bulletin boards or through email exchanges.
	
	For example, at step 430, users located at PC 210a and PC 210b may interact with each other in the chat room and perhaps determine that they both would like to play the computer game which is included in the application object which has been previously emailed to both users or which may been e-mailed from one user to the other outside of the chat room.
	
	In order to provide multiple player game play thought the Internet 150 under the control of central controller 115, a number of steps take place. Those skilled in the art will recognize that control could alternatively be accomplished through a peer-to-peer network or though other communications links.
	
	It is also possible that other users may also have been located in the chat room and selected for inclusion in the multiple player game.
	
	At step 415, after the connection has been established, central controller 115 may request particular information from the user prior to initiating any further activity. The information request may include a request for personal information or other information which my be useful in marketing the application (e.g. computer game).