

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

FUNCTION MEDIA, L.L.C.	§	
	§	
Plaintiffs,	§	Civil Action No. 2007-CV-279
	§	
vs.	§	
	§	
GOOGLE, INC. AND YAHOO, INC.	§	
	§	
Defendants.	§	JURY TRIAL DEMANDED

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Docket Control Order, Plaintiff Function Media, L.L.C. ("Function Media") makes the following initial disclosures:

**(A) Correct Names of Parties**

The case caption contains the correct names of the parties to this lawsuit.

**(B) Potential Parties**

At this time, Function Media is unaware of any potential parties that need to be added to this lawsuit.

**(C) Legal Theories and Factual Bases of Claims or Defenses**

Function Media sues under the Patent Act for infringement of several Function Media patents, as more particularly set forth in its Infringement Contentions, previously served in this case under this Court's Local Patent Rule 3-1.

**(D) Persons with Knowledge**

<b>Name</b>	<b>Contact Information</b>	<b>Topics</b>
Michael Dean	c/o Susman Godfrey, L.L.P. 1000 Louisiana, Suite 5100 Houston, TX 77002 (713) 651-9366	Named co-inventor on all patents-in-suit. Has knowledge of topics relevant to the patents-in-suit, including conception and reduction to practice, best mode, enablement, inventorship, prior art, prosecution, alleged inequitable conduct, and offers (if any) to license the patents-in-suit. Also has knowledge of corporate matters relating to Function Media.
Lucinda Stone	c/o Susman Godfrey, L.L.P. 1000 Louisiana, Suite 5100 Houston, TX 77002 (713) 651-9366	Named co-inventor on all patents-in-suit. Has knowledge of topics relevant to the patents-in-suit, including conception and reduction to practice, best mode, enablement, inventorship, prior art, prosecution, alleged inequitable conduct, and offers (if any) to license the patents-in-suit. Also has knowledge of corporate matters relating to Function Media.
Shoaib Mohammed Hasan	Shoaib Mohammed Hasan 8111 Sycamore Drive Irving, TX 75063 (214) 914-3790	Programmer. Has knowledge of topics relevant to the patents-in-suit, including the Virtual Cities software and information related to diligence and reduction to practice.
Robert A. Cote, Esq.	Robert A. Cote, Esq. McKool Smith 399 Park Avenue, Suite 3200 New York NY 10022 (212) 402-9402	Attorney. Has knowledge, much of which is privileged, of topics relevant to the patents-in-suit, including prosecution of the '025 and '059 patents, prior art, and alleged inequitable conduct.
Henry Croskell, Esq.	Henry Croskell, Esq. 7714 Village Trail Drive Dallas, TX 75254	Patent prosecution attorney. Has knowledge, much of which is privileged, of topics

Name	Contact Information	Topics
	(580) 222-9994	relevant to the patents-in-suit, including prosecution of the patents-in-suit and alleged inequitable conduct.
Michael A. Morrissey, Esq.	Michael A. Morrissey, Esq. NovaTech Law PLLC 11921 Freedom Dr., Suite 550 Reston, VA 20190 (703) 736-8322	Attorney. Has knowledge, much of which is privileged, of topics relevant to the '045 patent, including efforts to license the '045 patent and communications with Yahoo! regarding same.
James Brock, Esq.	James Brock, Esq. CEO, Contributor 1775 Woodside Road, Suite 100, Redwood City, CA 94061	Former law partner of Michael Morrissey. Former SVP, Communications & Consumer Services at Yahoo. Has knowledge of topics relevant to the '045 patent, including efforts to license the '045 patent and communications regarding same.
Thomas E. Schatzel, Esq.	Thomas E. Schatzel, Esq. 16400 Lark Avenue, Suite 240 Los Gatos, CA 95032 (408) 358-7733	Attorney. Has knowledge, much of which is privileged, of topics related to the '045 patent, including information related to diligence and reduction to practice.
Kenneth S. Roberts, Esq.	Kenneth S. Roberts, Esq. Orrick 4 Park Plaza, Suite 1600 Irvine, CA 92614-2558 (949) 567-6700	Attorney. Has knowledge, much of which is privileged, of topics relevant to the patents-in-suit, including prosecution of the '025 and '059 patents, prior art, and alleged inequitable conduct.
Arnold Behrman	Arnold Behrman Nat'l Sales Manager 301 Pleasant Valley Road Morganville, NJ 07751 (732) 946-3304	Inventor. Has knowledge of the Mason patent, including communications with Kenneth Roberts regarding same.
Acacia Research Corp.	Erik Ahroon Business Development Manager Acacia Research Corp. 500 Newport Center Dr., 7th Fl. Newport Beach, CA 92660 (949) 480-8340	Patent acquirer. Has knowledge of attempts to acquire the '025 patent.

**(E) Indemnity and Insurance Agreements**

Function Media has no relevant indemnity or insurance agreements.

**(F) Settlement Agreements**

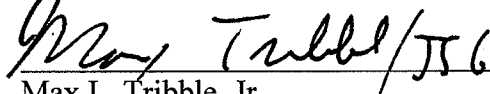
Function Media is unaware of any relevant settlement agreements.

**(G) Statement of Any Party to the Litigation**

At present, Function Media is unaware of any discoverable statements of any party to this litigation.

DATED: March 24, 2008

Respectfully submitted,



Max L. Tribble, Jr.

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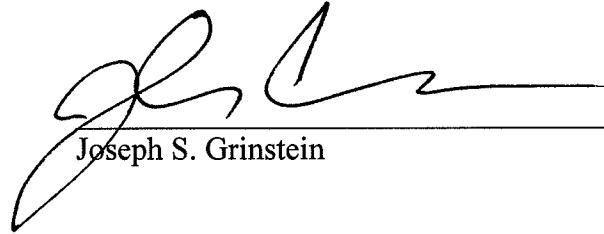
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**CERTIFICATE OF SERVICE**

I hereby certify that, on March 24, 2008, I e-mailed the foregoing document to counsel of record for Google and Yahoo.



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Joseph S. Grinstein