EXHIBIT A-2

As set forth below and based on the investigation to date, this exhibit provides the full identity of each item of prior art, including: (1) each patent by its patent number, country of origin, and date of issue; (2) each non-patent publication by its title, date of publication, and, where feasible, author and publisher; and (3) 35 U.S.C. § 102(b) prior art by the item offered for sale or publicly used or known, the date the offer or use took place or the information became known, and the identity of the person or entity which made the use or which made and received the offer, or the person or entity which made the information known or to whom it was made known.

The prior art references disclosed below are based on Bright Response's apparent construction of the claim elements of the '450 patent. Nothing stated herein shall be treated as an admission or suggestion that Defendants agree with Bright Response regarding either the scope of any of the asserted claims or the claim constructions advanced by it in its Infringement Contentions, Supplemental Infringement Contentions, or anywhere else. In the tables below, each patent or publication is identified by a "Short Name" that is used to identify that reference throughout Defendants' Invalidity Contentions.

(1)   Each prior art patent or patent application by its number, country of origin, and date of issue (for each patent) or date of publication (for each patent publication):

Short Name	Patent No./ Publication No.	Country of Origin	Date Issued / Published	Bates Range
ALLEN '664	5,581,664	United States	December 17, 1996	DEF00000109 – DEF00000131
ALLEN '664 CBR EXPRESS USER'S GUIDE	5,581,664	United States	December 3, 1996	YAH0021073 – YAH0021144 AND YAH0021145 – YAH0021216
BAUER '402	5,699,402	United States	December 16, 1997	DEF00001816 – DEF00001841
BROWN '353	5,768,353	United States	June 16, 1998	DEF00001842 – DEF00001895
HO '771	5,836,771	United States	November 17, 1998	DEF00000198 – DEF00000236
SHOHAM '015	5,855,015	United States	December 29, 1998	DEF00001896 – DEF00001909
TANAKA '985	5,899,985	United States	May 4, 1999	DEF00000266 – DEF00000303
TURTLE '948	5,418,948	United States	May 23, 1995	DEF00001793 – DEF00001815
SIMOUDIS '206	5,224,206	United States	June 29, 1993	DEF00000001 – DEF00000012
YOSHIURA '689	5,243,689	United States	September 7, 1993	DEF00000019 – DEF00000036
DOLAN '677	5,317,677	United States	May 31, 1994	DEF00000037 – DEF00000045
BAUMAN '524	5,402,524	United States	Match 28, 1995	DEF00000046 – DEF00000098
NGUYEN '823	5,444,823	United States	August 22, 1995	DEF00000099 – DEF00000108
ALLEN '218	5,586,218	United States	December 17, 1996	DEF00000132 – DEF00000181
LEWIS '481	5,666,481	United States	September 9, 1997	DEF00000182 – DEF00000197
NYUGEN '001	5,720,001	United States	February 17, 1998	DEF00001760 –

Short Name	Patent No./ Publication No.	Country of Origin	Date Issued / Published	Bates Range
				DEF00001769
Ho '302	5,884,302	United States	March 16, 1999	DEF00000237 – DEF00000265
HALL '679	5,909,679	United States	June 1, 1999	DEF00000304 – DEF00000318
SASSIN '435	6,058,435	United States	May 2, 2000	DEF00000319 – DEF00000332
REDFERN '914	6,078,914	United States	June 20, 2000	DEF00000333 – DEF00000367
TSO '201	6,085,201	United States	July 4, 2000	DEF00000368 – DEF00000377
ALLEN '92	WO 92/15951	PCT Application	September 17, 1992	DEF00000378 – DEF00000422
ALLEN '93	WO 93/21587	PCT Application	October 28, 1993	DEF00000423 – DEF00000451
ALLEN '95	WO 95/02221	PCT Application	January 19, 1995	DEF00000452 – DEF00000522

(2)   Each non-patent publication by its title, date of publication, and, where feasible,

author and publisher:

Short Name	Title	Date of Publication	Author (Publisher)	Bates Range
AAMODT '94	Case-Based Reasoning: Foundational Issues, Methodological Variations, and System Approaches	1994	Aamodt, Agnar, et al.	DEF00000576 – DEF00000596
ACORN '92	SMART: Support Management Automated Reasoning Technology for COMPAQ Customer Service	1992	Acorn, T., et al.	DEF00001090 – DEF00001098
ALLEN '94	Case-Based Reasoning:	1994	Allen,	DEF00000597 –

Short Name	Title	Date of Publication	Author (Publisher)	Bates Range
	Business Applications		Bradley P.	DEF00000599
AURIOL '95	INRECA: A Seamlessly Integrated System Based on Inductive Reasoning and Case-Based Reasoning	1995	Auriol, E., et al.	DEF00001099 – DEF00001111
BRANTING '90	Integrating Rules And Precedents For Classification And Explanation: Automating Legal Analysis	1990	L. Karl Branting	YAH0021248 - YAH0021417
CHANG '96	A Self-Improving Helpdesk Service System Using Case-Based Reasoning Techniques	1996	Chang, Kai, et al.	DEF00001715 – DEF00001730
CHI '91	An Integrated Approach of Rule-Based and Case-Based Reasoning for Decision Support	1991	Chi, Robert T., et al.	DEF00001077 – DEF00001089
COHEN '95	Fast Effective Rule Induction	1995	Cohen, William W.	DEF00001770 – DEF00001778
COHEN '96	Learning Rules that Classify E-Mail	1996	Cohen, William W	DEF00001779 – DEF00001786
DUTTA '91	Integrating Case Based and Rule Based Reasoning: The Possibilistic Connection	1991	Dutta, Somitra, et al.	DEF00001209 – DEF00001227
EZ READER	EZ Reader: Embedded AI for Automatic Electronic Mail Interpretation and Routing	1996	Rice, Amy, et al.	DEF00001742 – DEF00001752
FATHI-TORBAGHAN '95	ICARUS: Integrating Rule-Based and Case-Based Reasoning on the Base of Unsharp Symptoms	1995	Fathi-Torbaghan, M., et al.	DEF00000600 – DEF00000603
FOX '95	Introspective Learning for Case-Based Planning,	1995	Fox, Susan	DEF00000604 – DEF00000873

Short Name	Title	Date of Publication	Author (Publisher)	Bates Range
	Ph.D. Thesis			
GOLDING '91	Improving Rule-Based Systems Through Case-Based Reasoning	1991	Golding, Andrew R., et al.	DEF00000874 – DEF00000881
GOLDING '96	Improving Accuracy by Combining Rule-Based and Case-Based Reasoning	1996	Golding, Andrew R., et al.	DEF00000882 – DEF00000929
HALL '96	INFOMOD: A Knowledge-Based Moderator for Electronic Mail Help Lists	1996	Hall, Robert	DEF00001680 – DEF00001687
HILL '95	Recommending and Evaluating Choices in a Virtual Community of Use	1995	Hill, Will, et al.	DEF00000549 – DEF00000558
INFERENCE '95	CBR Express Reference Manual	1995	INFERENCE	YAH0021062 - YAH0021072
JEFFERIES '87	Comparing a Form-based and a Language-based User Interface for Instructing a Mail Program	1987	Jeffries, Robin, et al.	DEF00001787 – DEF00001792
JURISICA '96	Inductive Learning and Case-Based Reasoning	1996	Jurisica, Igor	DEF00000930 – DEF00000935
KOWALSKI '91	Case-Based Reasoning and the Deep Structure Approach to Knowledge Representation	1991	Kowalski, Andrezj	DEF00001695 – DEF00001704
KRIEGSMAN '93	Building a Case-Based Help Desk Application	1993	Kriegsman, Mark, et al.	DEF00001665 – DEF00001673
LEAKE '96	Chapter 1: CBR in Context: The Present and Future, Case-Based Reasoning	1996	Leake, David B.	DEF00000936 – DEF00000979
LENZ '93	Cabata – A Hybrid CBR System	1993	Lenz, Mario	DEF00001753 – DEF00001758

Short Name	Title	Date of Publication	Author (Publisher)	Bates Range
LOPEZ '93	Case-based Planning for Medical Diagnosis	1993	Lopez, Beatriz, et al.	DEF00001177 – DEF00001188
MANAGO '93	Induction and Reasoning from Cases	1993	Manago, Michel, et al.	DEF00000013 – DEF00000018
NGUYEN '93	Compaq Quicksource: Providing the Consumer with the Power of AI	1993	Nguyen, Trung, et al.	DEF00001731 – DEF00001741
NITTA '92	Helic II – A Legal Reasoning System on the Parallel Inference Machine	1992	Nitta, Katsumi, et al.	DEF00000523 – DEF00000548
POLLOCK '88	A Rule-Based Message Filtering System	1988	Pollock, Stephen	DEF00001944 – DEF00001966
POPPLE '96	A Pragmatic Legal Expert System	1996	Popple, James	DEF00001270 – DEF00001664
PORTINAL '95	ADAPtER: An Integrated Diagnostic System Combining Case-Based and Abductive Reasoning	1995	Portinale, L, et al.	DEF00001112 – DEF00001126
RISSLAND '87	A Case-Based System for Trade Secrets Law	1987	Rissland, Edwina, et al.	DEF00001688 – DEF00001694
RISSLAND '89	Combining Case-Based and Rule-Based Reasoning: A Heuristic Approach	1989	Rissland, Edwina, et al.	DEF0000569 – DEF0000575
RISSLAND '91	CABARET: Rule Interpretation in a Hybrid Architecture	1991	Rissland, Edwina, et al.	DEF00001127 – DEF00001176
RISSLAND '93	Case-based Diagnostic Analysis in a Blackboard Architecture	1993	Rissland, Edwina, et al.	DEF00001189 – DEF00001197
RISSLAND '95	A Hybrid CBR-IR Approach to Legal Information Retrieval	1995	Rissland, Edwina, et al.	DEF00000559 – DEF00000568
SIMOUDIS '92	Using Case-Based Retrieval for Customer Technical Support	1992	Simoudis, Evangelos	DEF00001674 – DEF00001679

Short Name	Title	Date of Publication	Author (Publisher)	Bates Range
SKALAK '91	Argument Moves in a Rule-Guided Domain	1991	Skalak, David, et al.	DEF00001066 – DEF00001076
SKALAK '92	Arguments and Cases: An Inevitable Intertwining	1992	Skalak, David, et al.	DEF00001228 – DEF00001269
SLATOR '91	Taxops: A Case-Based Advisor	1991	Slator, Brian, et al.	DEF00000986 – DEF00001013
SURMA '95	Integrating Rules and Cases for the Classification Task, Case-Based Reasoning, Research and Development	1995	Surma, Jerzy, et al.	DEF00001014 – DEF00001023
VENKATARAMAN '93	A Rule – Rule – Case Based System for Image Analysis	1993	Venkataraman, S., et al.	DEF00001759 – DEF00001764
VOSSOS '91	An Example of Integrating Legal Case Based Reasoning with Object Oriented Rule-Based Systems: IKBALS II	1991	Vossos, George, et al.	DEF00001198 – DEF00001208
WATSON '94	Case-Based Reasoning: A Review	1994	Watson, Ian, et al.	DEF00001024 – DEF00001056
WATSON '94	Case-Based Reasoning: A Review	1994	Watson, Ian, et al.	YAH0021217 - YAH0021247
WATSON '96	Case-Based Reasoning Tools: An Overview	1996	Watson, Ian	DEF00001057 – DEF00001065
WHITEHEAD '95	Auto-FAQ: An Experiment in Cyberspace Leveraging	1995	Whitehead, Steven	DEF00001705 – DEF00001714

(3)   35 U.S.C. § 102(b) prior art by the item offered for sale or publicly used or known, the date the offer or use took place or the information became known, and the identity of the person or entity which made the use or which made and received the offer, or the person or entity which made the information known or to whom it was made known. Defendants' investigation is ongoing, and the identified relevant publications in no way limit the evidence Defendants may rely on concerning these sales or public uses:

Items Offered for Sale or Publicly Known or Used	Date of Offer or Use	Person or Entity Involved
EZ Reader	1996	Rice, Amy, et al. and as described in the above-identified prior art authored by the individual
CBR EXPRESS	1995	Inference
Helic II	1992	Nitta, Katsumi, et al. and as described in the above-identified prior art authored by the individual
ICARUS	1995	Fathi-Torbaghan, M., et al. and as described in the above-identified prior art authored by the individual
Taxops	1991	Slator, Brian, et al. and as described in the above-identified prior art authored by the individual
SMART	1992	Acorn, T., et al. and as described in the above-identified prior art authored by the individual
INRECA	1995	Auriol, E., et al. and as described in the above-identified prior art authored by the individual
ADAPtER	1995	Portinale, L, et al. and as

Items Offered for Sale or Publicly Known or Used	Date of Offer or Use	Person or Entity Involved
		described in the above-identified prior art authored by the individual
CABARET	1991	Rissland, Edwina, et al. and as described in the above-identified prior art authored by the individual
IKBALS II	1991	Vossos, George, et al. and as described in the above-identified prior art authored by the individual
INFOMOD	1996	Hall, Robert and as described in the above-identified prior art authored by the individual
Auto-FAQ	1995	Whitehead, Steven and as described in the above-identified prior art authored by the individual
Compaq Quicksource	1993	Nguyen, Trung, et al. and as described in the above-identified prior art authored by the individual
Cabata	1993	Lenz, Mario and as described in the above-identified prior art authored by the individual
ROBBIE	1995	Fox, Susan and as described in the above-identified prior art authored by the individual
ANAPRON	1996	Golding, Andrew R. et al. and as described in the above-identified prior art authored by the individual
TA3	1996	Jurisica, Igor and as described in the above-identified prior art authored by the individual

Items Offered for Sale or Publicly Known or Used	Date of Offer or Use	Person or Entity Involved
CHI	1991	Chi, Robert T., et al. and as described in the above-identified prior art authored by the individual
BOLERO	1993	Lopez, Beatriz, et al. and as described in the above-identified prior art authored by the individual
FRANK	1993	Rissland, Edwina, et al. and as described in the above-identified prior art authored by the individual
MARS	1991	Dutta, Somitra, et al. and as described in the above-identified prior art authored by the individual
SHYSTER	1996	Popple, James and as described in the above-identified prior art authored by the individual
CASCADE	1992	Simoudis, Evangelos and as described in the above-identified prior art authored by the individual
HYPO	1987	Rissland, Edwina, et al. and as described in the above-identified prior art authored by the individual
MPC	1991	Kowalski, Andrezj and as described in the above-identified prior art authored by the individual
SmartUSA	1996	Chang, Kai, et al. and as described in the above-identified prior art authored by the individual

Items Offered for Sale or Publicly Known or Used	Date of Offer or Use	Person or Entity Involved
R-R-C	1993	Venkatarman, S. et al. and as described in the above-identified prior art authored by the individual
ISCREEN	1988	Pollock, Stephen and as described in the above-identified prior art authored by the individual
GREBE	1990	Branting, L. Karl and as described in the above-identified prior art authored by the individual