

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

POLARIS IP, LLC,

Plaintiff,

v.

GOOGLE INC. et al.,

Defendants.

Civil Action No.: 2:07-cv-371

JURY TRIAL DEMANDED

DEFENDANT YAHOO! INC.'S SUPPLEMENTAL DISCLOSURES

Defendant Yahoo! Inc. (“Yahoo”) makes the following supplemental disclosures. However, Yahoo’s investigation is continuing, and this disclosure provides information currently known and available to Yahoo after a good-faith inquiry and investigation. Yahoo’s ability to perform additional inquiries and/or investigations is severely limited by the vagueness of the allegations included in the Complaint. Accordingly, Yahoo reserves the right to supplement and/or amend this disclosure.

1. DISCLOSURES

A. Yahoo’s correct name is Yahoo! Inc. Yahoo is without knowledge of the correct names of the other parties to this action.

B. Yahoo is unaware of any potential parties to this lawsuit.

C. Yahoo believes that U.S. Patent No. 6,411,947 (the “ ‘947 patent”) is invalid for failure to comply with one or more of 35 U.S.C. §§ 102, 103, and/or 112, as evidenced by the recent order from the United States Patent Office granting an *ex parte* request for reexamination of the ‘947 patent. Accordingly, Yahoo denies infringement of any valid claim of the ‘947 patent. Yahoo also believes that any properly plead claims of infringement of the ‘947 patent would be barred by the doctrines of laches and/or estoppel. Yahoo also believes that any

23. Chuck Williams (Address unknown, (808) 889-6789) (former CTO of Inference Corp., and former CEO of Brightware, Inc.): Information known by this person is expected to include the technology and products that became the '947 patent, and the technology and products that became U.S. Patent No. 5,581,664.
24. Bradley Allen (former Inference Corp. employee) (1446 5th Street, Manhattan Beach, CA 90266, (310) 951-4300): Information known by this person is expected to include the technology and products that became the '947 patent, and the technology and products that became U.S. Patent No. 5,581,664.
25. Karl Branting (9734 Summer Park Ct., Columbia, MD 21046, (410) 660-9094, Lead Artificial Intelligence Engineer, The Mitre Corporation): Yahoo!'s expert regarding invalidity.
26. Gerald Mossinghoff (Oblon, Spivak, McClelland, Maier & Neustadt, P.C. 1940 Duke Street, Alexandria, Virginia 22314): Yahoo!'s expert regarding inequitable conduct.
27. Mary Woodford (1919 Pennsylvania Avenue, N.W., Suite 600, Washington, District of Columbia 20006, Senior Advisor of Cornerstone Research): Yahoo!'s expert regarding damages.
28. James Allan (140 Governors Drive, Amherst, Massachusetts 01003, (413) 545-3240, Professor of Computer Science at University of Massachusetts, Amherst): Yahoo!'s expert regarding non-infringement.

The above individuals may be contacted only through counsel at Howrey LLP, 321 N. Clark Street, Chicago, Illinois 60654, (312) 595-1239.

29. Amy Rice (Named Inventor) (22 Whitlock Lane, Ridgefield, CT 06877, (203) 894-8608): Information known by this person is expected to include: the alleged inventions claimed in the '947 patent and any related patents or patent applications; the design, development, disclosure, offer for sale, and/or sale of any product or service covered by the '947 patent and any related patents or patent applications; the preparation and prosecution of the '947 patent and any related patents or patent applications; prior art to the '947 patent and any related patents or patent applications; the disclosure, or lack thereof, of prior art to the U.S. Patent Office in connection with the '947 patent and any related patents or patent applications; ownership of the '947 patent and any related patents or patent applications; any consideration given or received for the transfer or assignment of the '947 patent and any related patents or patent applications; any efforts to assert the '947 patent and any related patents or patent applications against any entity; any license agreements or term sheets relevant to the '947 patent and any related patents or patent applications; and any license agreements or term sheets for patents that cover technology that is related to what is disclosed in the '947 patent.
30. Julie Hsu (Named Inventor) (Address Unknown, (914) 737-6806): Information known by this person is expected to include: the alleged inventions claimed in the '947 patent and any related patents or patent