

EXHIBIT A

Chart A-4

Claim Chart of “EZ Reader: Embedded AI for Automatic Electronic
Mail Interpretation and Routing” (“EZ READER”)
as prior art to
Asserted Claims of U.S. Patent No. 6,411,947 (“’947 Patent”)

This chart is based on Bright Response’s apparent construction of the claims, and is not an admission that those constructions are correct or appropriate.

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Claim 26	
A method for automatically processing a non-interactive electronic message using a computer, comprising the steps of:	EZ READER 1507, 1510.
(a) receiving the electronic message from a source;	EZ READER 1507, 1509.
(b) interpreting the electronic message using a rule base and case base knowledge engine; and	EZ READER 1507, 1509-13.
(c) retrieving one or more predetermined responses corresponding to the interpretation of the electronic message from a repository for automatic delivery to the source.	EZ READER 1509-11.
Claim 27	
The method of claim 26, wherein the source of the electronic message is not predetermined.	EZ READER 1507, 1509.
Claim 28	
The method of claim 26, further comprising the steps of:	

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(b1) classifying the electronic message as at least one of (i) being able to be responded to automatically; and (ii) requiring assistance from a human operator; and	EZ READER 1509. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 Abstract, 9:21-50; BAUER '402 8:7-21, 14:33-38, 16:34-39, Fig. 3A; BROWN '353 30:9-49; HO '771 20:57-21:20, 25:41-26:4, Fig. 11; SHOHAM '015, 8:8-24, 8:61 – 9:8; TANAKA '985 8:14-35, 20:41-56; TURTLE '948, 2:64-68, 9:15-17.
(c) retrieving one or more predetermined responses corresponding to the interpretation of the electronic message from a repository for automatic delivery to the source when the classification step indicates that the electronic message can be responded to automatically.	EZ READER 1509. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 2:45-49, 9:21-29, 9:7-11; BAUER '402 3:38-53, 12:34-48, 18:46-19:13, Figs. 3A and 3B; BROWN '353 30:9-49; HO '771 2:13-23, 22:58-23:5, Figs. 5, 6, and 14; SHOHAM '015, 7:65 – 8:24, 8:32-38, 8:54-60, Fig. 4; TANAKA '985 3:14-25; TURTLE '948, 15:61 – 16:2, 17:67 – 18:2.
Claim 30	
The method of claim 28, wherein the step of interpreting the electronic message further includes the steps of:	
(b1) producing a case model of the electronic message including (i) a set of attributes for identifying specific features of the electronic message; and (ii) message text;	EZ READER 1510. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 4:35-44; 5:3-11; BROWN '353 6:39-46; 30:56-31:15; HO '771 23:40-25:27; SHOHAM '015, 11:28-32, 11:38-54; TANAKA '985 13:42-14:2, 15:30-49, Figs. 5, 6(a), and 6(b); TURTLE '948, 3:9-20, 11:11-13, 11:22-28, 11:40-55.

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(b2) detecting at least one of text, combinations of text, and patterns of text of the electronic message using character matching;	<p>EZ READER 1510, 1511.</p> <p>To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i>, ALLEN '664 6:24-31, 6:41-43; BROWN '353 32:19-42; HO '771 10:24-11:41; SHOHAM '015, 11:28-32, 11:38-54; TANAKA '985 16:6-12, Figs. 5, 6(a), and 6(b); TURTLE '948 Claim 1, 9:46-52.</p>
(b3) flagging the attributes of the case model which are detected in the electronic message;	<p>EZ READER 1511, 1513.</p> <p>To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i>, ALLEN '664 5:3-15, 6:53-57; BAUER '402 12:33-13:9; BROWN '353 28:60-29:10; HO '771 25:11-21; SHOHAM '015, 11:28-32, 11:38-54; TANAKA '985 15:30-49, Figs. 5, 6(a), and 6(b); TURTLE '948, 5:25-29, 11:11-13, 11:40-55, 18:60-65.</p>
(b4) comparing the flagged attributes of the case model with stored attributes of stored case models of the case base;	<p>EZ READER 1512, 1513.</p> <p>To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i>, ALLEN '664 5:3-26; BAUER '402 12:33-13:9; BROWN '353 30:56-31:15; HO '771 23:40-24:42, 25:11-21; SHOHAM '015, 12:8-14; TANAKA '985 15:50-16:39; TURTLE '948, 5:25-29, 11:1-10, 11:54-56, Fig. 8.</p>
(b5) comparing the text of the case model with stored text of the stored case models of the case base; and	<p>EZ READER 1512.</p> <p>To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i>, ALLEN '664 6:24-31, 6:41-43; BROWN '353 32:19-42; HO '771 23:40-24:42; SHOHAM '015, 12:8-14; TANAKA '985 16:6-12, Figs. 5, 6(a), and 6(b); TURTLE</p>

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	'948, 14:3-12, 18:56-59.
(b6) assigning a score to each stored case model which is compared with the case model, the score increasing when at least one of the attributes and the text match the stored case model and the score not increasing when at least one of the attributes and the text do not match the stored case model.	EZ READER 1512. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 5:15-26; BAUER '402 12:33-13:9; BROWN '353 25:28-42; HO '771 23:40-25:27; SHOHAM '015, 11:16-27; TANAKA '985 16:18-25; TURTLE '948, 14:42-46, 13:63 – 14:35.
Claim 31	
The method of claim 30, wherein:	
when at least one of the attributes and the text match the stored case model, the score is increased by a predetermined match weight; and	EZ READER 1512. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 5:15-26; BAUER '402 12:33-13:9; HO '771 23:40-25:27; SHOHAM '015, 11:16-27; TANAKA '985 16:18-25; TURTLE '948, 13:63 – 14:35.
when at least one of the attributes and the text does not match the stored case model, the score is decreased by a predetermined mismatch weight.	EZ READER 1512. To the extent this reference does not teach this claim element, and as detailed in section III.C of Defendants' Supplemental Invalidity Contentions, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.</i> , ALLEN '664 5:15-26; BAUER '402 12:33-13:9; HO '771 23:40-25:27; SHOHAM '015, 11:16-27; TANAKA '985 22:30-64, Fig. 17; TURTLE '948, 13:63 – 14:2, 14:42-46.
Claim 33	
The method of claim 31, wherein each score is	EZ READER 1512.

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normalized by dividing the score by a maximum possible score for the stored case model, where the maximum possible score is determined when all of the attributes and text of the case model and the stored case model match.	To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.,</i> ALLEN '664 10:40-44; BAUER '402 12:33-13:9; BROWN '353 25:34-63, 26:20-26; CBR-EXPRESS at 9, 11; HO '771 23:40-25:27; SHOHAM '015, 11:52-55; TANAKA '985 15:50-16:39, Fig. 17; TURTLE '948: 14:37-41, 17:10-17.
Claim 38	
The method of claim 26, wherein the predetermined response is altered in accordance the interpretation of the electronic message before delivery to the source.	EZ READER 1509-11.
Claim 39	
The method of claim 26, wherein the electronic message includes fixed data.	EZ READER 1507, 1509.
Claim 40	
The method of claim 26, wherein the electronic message includes variable data.	EZ READER 1507, 1509.