

EXHIBIT B

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

damages claims asserted against Yahoo are barred and/or limited by the patent owner's failure to comply with 35 U.S.C. § 287. Yahoo further believes that plaintiff is not entitled to any form of injunctive relief. Finally, Yahoo believes that the '947 patent is unenforceable due to inequitable conduct by the named inventor's, their attorneys, and/or their agents. Yahoo's investigation is ongoing, and Yahoo reserves the right to raise additional affirmative defenses and/or counterclaims as its investigation proceeds.

D. Yahoo believes that the following individuals are likely to have knowledge of relevant facts in this case:

1. John Slade (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's search marketing product/service.
2. Ryan Fong (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include marketing and finances of Yahoo's algorithmic search product/service.
3. Ivan Markman (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include marketing and finances of Yahoo's search marketing product/service.
4. Arnab Bhattacharjee (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's algorithmic search product/service.

5. Amadou Fall (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include marketing and finances of Yahoo's Toolbar product/service.
6. Michael Chiu and Matt Pfefferlen (Yahoo! Employees) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by these people is expected to include marketing and finances of Yahoo's Shopping product/service.
7. John Peng (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include Yahoo's metrics.
8. Larry Cornett (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include business plans and forecasts of Yahoo's algorithmic search product/service.
9. David Miller (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include business plans and forecasts of Yahoo's search marketing product/service.
10. Joseph Bou-Younes (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include business plans and forecasts of Yahoo's Toolbar product/service.

11. Ken Kronquist (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include business plans and forecasts of Yahoo's Shopping product/service.
12. Himanshu Verma (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's Toolbar product/service.
13. Brandon Ramsey (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's Shopping product/service.
14. Jeanine Hayes (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include licenses that relate to the technology described in the '947 patent.
15. Zachary Zhang (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include Keystone System and Sponsor Search System and other information, as reflected in the transcript of his deposition.
16. Ashvin Kannan (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include performance advertising and sponsored-search sciences and other information, as reflected in the transcript of his deposition.
17. David Kolm (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to

include Sponsored Search and other information, as reflected in the transcript of his deposition.

18. Luke Yeh (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include Yahoo!'s licensing practices and other information, as reflected in the transcript of his deposition.
19. Melissa Stein (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include Content Match and other information, as reflected in the transcript of her deposition.
20. David Eaton (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include financial information and other information, as reflected in the transcript of his deposition.
21. Jean-Marc Langois (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's search technology product/service and other information, as reflected in the transcript of his deposition.
22. Tak Yan (Yahoo! Employee) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include the operation of Yahoo's Click Protection, and other information, as reflected in the transcript of his deposition.

23. Keith Nilsson (Yahoo! Employee, Senior Vice President for Global Initiatives) (701 First Avenue, Sunnyvale, CA 94089, (408) 349-3300): Information known by this person is expected to include Yahoo!'s products and services and the business operations of Yahoo! Inc.
24. 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.
25. 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.
26. Karl Branting (9734 Summer Park Ct., Columbia, MD 21046, (410) 660-9094, Lead Artificial Intelligence Engineer, The Mitre Corporation): Yahoo!'s expert regarding invalidity.
27. Gerald Mossinghoff (Oblon, Spivak, McClelland, Maier & Neustadt, P.C. 1940 Duke Street, Alexandria, Virginia 22314): Yahoo!'s expert regarding inequitable conduct.
28. Mary Woodford (1919 Pennsylvania Avenue, N.W., Suite 600, Washington, District of Columbia 20006, Senior Advisor of Cornerstone Research): Yahoo!'s expert regarding damages.

29. 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.

30. 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.

31. 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 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.

32. Anthony Angotti (Named Inventor) (2 E. Main St., Marcellus, NY 13108,

(877) 456-1124): 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 there of, 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.

33. Rosanna Piccolo (Named Inventor) (Address Unknown): 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 there of, 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.

34. Fred Cohen (Named Inventor) (1215 5th Ave., New York, NY 10029, (212) 831-0566): 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.

35. Chase Manhattan Bank (Employer of Ms. Piccolo and Mr. Angotti) (P.O. Box 36520, Louisville, KY 40233): Information known by this entity 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.
36. Moore, Hansen & Sumner (Counsel for one of the patent owners) (225 South 6th Street 48th Floor Minneapolis, MN 55402, (612) 332-8200):

Information known by this entity 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.

37. Shumaker & Sieffert (Counsel for one of the patent owners) (1625 Radio Drive, Suite 300 St. Paul, MN 55125, (651) 735-1100): Information known by this entity 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 there of, 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.

38. HersHKovitz & Associates (Counsel for one of the patent owners) (2845 Duke Street Alexandria, VA 22314-4512, (703) 370-4800): Information known by this entity 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 there of, 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.

39. Townsend Townsend & Crew (Counsel for one of the patent owners) (2 Embarcadero Ctr, 8th Floor, San Francisco, CA 94111, (415) 576-0200): Information known by this entity 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.

40. Ostrolenk Faber Gerb & Soffen (Counsel for one of the patent owners)
(1180 Avenue of the Americas, New York, NY 10036, (212) 382-0700):

Information known by this entity 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.

41. Brightware, Inc. (Current and/or former patent owner) (350 Ignacio Blvd., Novato, CA 94949): Information known by this entity 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.
42. Firepond, Inc. (Current and/or former patent owner) (8900 34th Ave. South, Suite 1000, Bloomington, MN 55425): Information known by this entity 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.

43. Orion IP, LLC (Current and/or former patent owner) (74785 Highway 111, Suite 103, Indian Wells, CA 92210): Information known by this entity 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 there of, 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.

44. Circinus IP, LLC (Current and/or former patent owner) (74785 Highway 111, Suite 103, Indian Wells, CA 92210): Information known by this entity 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 there of, 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.

45. Polaris IP, LLC (Current and/or former patent owner) (207 C North Washington Avenue, Marshall, TX 75670): Information known by this entity 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.

46. Bright Response, LLC (Current and/or former patent owner) (207 C North Washington Avenue, Marshall, TX 75670): Information known by this entity 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.

Yahoo believes that the plaintiff is aware of the whereabouts and contact information for the individuals and entities listed in items 29-45 above.

Yahoo reserves the right to identify other individuals and entities who may have relevant information.

E. Yahoo is not aware of any indemnity or insuring agreements under which any person or entity may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

F. Yahoo is aware that Bright Response, LLC (f/k/a Polaris IP, LLC) and preceding entities have settled other lawsuits in which the '947 patent was asserted, and licensed the '947 patent, including, but not limited to documents Bates labeled: BR001351 - BR001363, BR001302 - BR001306, BR-CWC002414 - BR-CWC002429, OR017081 - OR017096, BR001307 - BR001309, BR011222 - BR011228, OR092360 - OR092381, OR092122 - OR092136, OR092171 - OR092196, BR010658 - BR010677, BR010749 - BR010769, BR011133 - BR011153, BR010725 - BR010747, BR011108 - BR011132, BR010589 - BR010610, OR102487 - OR102503, OR102469 - OR102486, OR102376 - OR102396, BR-CONST000376 - BR-CONST000395, BR010557 - BR010588, BR010525 - BR010540, OR103016 - OR103034, BR-CONST000396 - BR-CONST000432, OR129838 - OR129855, BR010633 - BR010657, BR010611 - BR010632, BR010541 - BR010556, BR-CONST000101 - BR-CONST000113, OR129964 - OR129978, OR144017 - OR144088, BR010512 - BR010524, OR144139 - OR144160, BR-CWC000842 - BR-CWC000863, OR144212 - OR144271, OR144426 - OR144447, OR144286 - OR144385, BR-CONST000321 - BR-CONST000342, BR-CONST000359 - BR-CONST000375, BR-CONST000304 - BR-CONST000320.

G. Yahoo is not aware of any statement of any party to the litigation.

H. Yahoo will provide the requisite disclosures for testifying experts by the deadline set forth in the Amended Docket Control Order.

2. ADDITIONAL DISCLOSURES

A. Yahoo will provide the disclosures required by the Court's Patent Rules in accordance with the deadlines set forth in the rules, the Court's Docket Control Order, and any other applicable Order.

B. Yahoo will produce, by the deadline set forth in the Docket Control Order, documents and data compilations, that are relevant to any pleaded claims or defenses, and that are not otherwise addressed in the Court's Patent Rules.

C. Yahoo may seek its costs and attorneys' fees in this case. However, Yahoo is unable to provide a computation of these costs and fees or any documents related to these costs and fees at this time.

Dated: July 2, 2010

Respectfully Submitted,

/s/ Jason C. White

Jennifer Doan

Joshua Reed Thane

HALTOM & DOAN

Crown Executive Center, Suite 100

6500 Summerhill Rd.

Texarkana, Texas 75503

Tel: 903.255.1002

Fax: 903.255.0800

Email: jdoan@haltomdoan.com

Email: jthane@haltomdoan.com

William C. Rooklidge
HOWREY, LLP
4 Park Plaza, Suite 1700
Irvine CA 92614-2559
Telephone: (949) 721-6900
rooklidgew@howrey.com

Jason C. White
Mansi Shah
Scott Sherwin
HOWREY LLP
321 N. Clark, Suite 3400
Chicago, IL 60654
Tel: 312.595.1239
Fax: 312.595.2250
Email: whitej@howrey.com
Email: shahm@howrey.com
Email: sherwins@howrey.com

Attorneys for Defendant Yahoo! Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served via email on all counsel of record on July 2, 2010.

/s/ Josh R. Thane

Josh R. Thane