

Exhibit B

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

BRIGHT RESPONSE, LLC,

Plaintiff,

v.

GOOGLE INC., et al.;

Defendants.

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

JURY TRIAL DEMANDED

**PLAINTIFF'S SUPPLEMENTAL DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

Bright Response, LLC ("Bright Response") provides the following Supplemental Disclosure of Asserted Claims and Infringement Contentions relative to Defendant Yahoo! Inc. ("Yahoo"). This disclosure supplements Bright Response's disclosures of June 6, 2008 and is made solely for the purpose of this action.

Discovery in this matter is ongoing. Yahoo has only recently begun producing source code, and additional code productions and technical depositions are anticipated. Bright Response's investigation regarding these and other potential grounds of infringement is ongoing. This supplemental disclosure is therefore based upon information that Bright Response has been able to obtain publicly, and from the documents and source code produced thus far, together with Bright Response's current good faith beliefs regarding the Accused Instrumentalities, and is given without prejudice to Bright Response's right to obtain leave to supplement or amend its disclosure as additional facts are ascertained, analyses is made, research is completed and claims are construed.

Restricted Confidential Source Code

These disclosures are based at least in part upon Bright Response's present understanding of the meaning and scope of the claims of U.S. Patent No. 6,411,947 ("the '947 patent") in the absence of claim construction proceedings or discovery. Bright Response reserves the right to seek leave to supplement or amend these disclosures if its understanding of the claims changes, including if the Court construes them.

Patent Rule 3-1(a)

Based on the information presently available, Bright Response states that Yahoo infringes at least claims 26, 27, 33, and 38-40 of the '947 Patent. With respect to claims 26, 27 and 38-40, see examples in the original Yahoo Exhibit served on June 8, 2008, which is expressly incorporated herein by reference. Further, with respect to claims 26 and 33, see Examples in the attached Supplemental Yahoo Exhibit.

Patent Rule 3-1(b)

The claims asserted against Yahoo (see claims charted in the examples provided in the Yahoo Exhibit served on June 8, 2008, which is expressly incorporated herein by reference and the Supplemental Yahoo Exhibit, attached hereto) are directed to various claimed methods comprising automatically processing a non-interactive electronic message, for example user queries, searches, clicks, advertising requests, using a computer, for example, the servers and other computers used in connection with the www.yahoo.com website, including Yahoo Search, Yahoo Sponsored Search, Yahoo Search Marketing, Yahoo Partner Network and the various systems, subsystems and components utilized by the foregoing, including, without limitation, Overture services, Yahoo Search Technology, Panama, Smart Ads, Exact Match, Keystone, Content Match, Subphrase Match, Orthographic Match, Domain Match, King Kong, Godzooky, Behavioral Targeting, Fusion, Dynamic Unit Display Engine (DUDE), Modular Dynamic