

EXHIBIT B

**TO PLAINTIFFS' P.R. 4-5(c)
REPLY BRIEF REGARDING
CLAIM CONSTRUCTION**

BY E-MAIL

August 21, 2009

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Douglas M. Hall
 Niro, Scavone, Haller & Niro
 181 West Madison, Suite 4600
 Chicago, IL 60602

Re: *IP Innovation L.L.C. et al. v. Google Inc.*, E.D. Tex. Civil Action No. 2:07-CV-503 LED

Dear Doug:

In an effort to resolve the differences in the parties' proposed constructions of disputed claim terms, Google has re-evaluated its proposed constructions in light of IP Innovation, L.L.C. and Technology Licensing Corp.'s proposed constructions. Pursuant to section II of the Joint Claim Construction and Prehearing Statement, Google identifies the following amended proposed constructions for the claim terms in U.S. Patent No. 5,276,785:

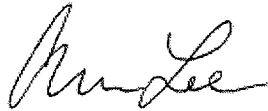
Term	Google's Previously Proposed Construction	Google's Amended Proposed Construction
the user can request viewpoint motion and point of interest motion independently (claim 52)	A user can request viewpoint and point of interest motion separately through different user input devices	The user can request viewpoint motion and point of interest motion separately and simultaneously
user input means for providing signals (claim 52)	Structure: any two of a computer keyboard or its equivalent, a computer mouse or its equivalent, or a VPL glove or its equivalent Function: providing signals	Structure: one or more user input devices that provide separate signals based on actions of a user, such as a keyboard, a mouse, a multidimensional input device such as a VPL glove or other input device and each of their equivalents Function: providing signals requesting viewpoint motion and point of interest motion

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motion requesting signal set (claim 52)	A group of commands indicating a point of interest and requesting viewpoint motion relative to the indicated point of interest	A group of commands indicating a point of interest motion and a viewpoint motion relative to the point of interest
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Google believes its amended constructions comport with the ordinary and customary meaning of the claim terms and the intrinsic and extrinsic evidence. Please let me know when you are available to discuss whether the plaintiffs concur in Google's amended proposed constructions.

Sincerely,



Anna Lee

cc: Counsel of record (*via e-mail*)