EXHIBIT 28

EXHIBIT 28

Invalidity of U.S. Pat. No. 6,768,999
As Disclosed by Lucas Workscape

	'999 Patent Claim Language	Disclosure
		In its infringement contentions, Mirror Worlds has applied various claim limitations in an overly-broad manner, in an attempt to read those limitations on the accused products. *See* Ex. 13. While Apple disputes that approach, Apple has, for the purposes of this summary judgment motion, applied the same breadth of Mirror Worlds' infringement contentions to the prior art. Nothing in these disclosures should be interpreted as an acquiescence to or assertion of a particular claim construction by Mirror Worlds. The Lucas Workscape references include: • U.S. Patent No. 5,499,330 to Lucas et al. ("'330 patent") (Ex. 5.) • Transcript of the Deposition of Peter Lucas, Ph.D. taken on June 16, 2010 ("Lucas Depo. Tr."). (Ex. 29.) • "CHI '94 Video", which is a video that was publically disclosed at the CHI (computer-human interaction) conference in 1994. (Ex. 7.) • Peter Lucas and Lauren Schneider, "Workscape: A Scriptable Document Management Environment," CHI '94 Conference Companion, pp. 9-10 (April 24-28, 1994). (Ex. 8.) • Joseph M. Ballay, "Designing Workscape: An Interdisciplinary Experience," CHI '94 Conference, pp. 10-15 (April 24-28, 1994). (Ex. 9.) See Lucas Depo. Tr. at 56:1-58:10; 170:13-172:4 for description of the relationship between publically disclosed references such as the CHI '94 Video and the '330 patent. See Lucas Depo. Tr. at 103:15-104:24 for discussion of the above listed "Workscape: A Scriptable Document Management Environment" publication. Lucas Workscape anticipates one or more of the asserted claims, and renders obvious all others in view of one or more of the below listed references: U.S. Patent No. 6,243,724 to Mander et al. ("Mander") was filed on August 8, 1994 and issued on June 5, 2001. (Ex. 10.)

	’999 Patent Claim Language	Disclosure
		Emphasis is added in the disclosures below, unless otherwise indicated.
	Claim 1	
1	A method of operating an enterprise information management system comprising at least one server and a number of personal computers selectively communicating with each other comprising: **<u>Claim Construction Order (Ex. 24):</u>** **Enterprise information management system** = a system that manages information for an enterprise or organization.	Lucas Workscape describes a method of operating an enterprise information management system comprising at least one server and a number of personal computers selectively communicating with each other. See disclosure provided for claim 1 in the ’313 patent invalidity chart. (Ex. 26.)
1A	creating document object models comprising selected	Lucas Workscape describes creating document object models comprising selected information from and about information assets of diverse types, created by diverse software, the document object models having a consistent structure.

	’999 Patent Claim Language	Disclosure
	information from and about information assets of diverse types, created by diverse software, said document object models having a consistent structure; **Claim Construction Order:** **Document object model** = a consistent structure containing information about information assets of diverse types, created by diverse software. **Information assets** = data units of significance to the users in an enterprise	Lucas Workscape describes a uniform document object model in which document objects have attributes and attribute values. The object models comprise information from and about information assets of diverse types, created by diverse software. The object models have a consistent structure. **Support** • “These concepts of data modularity and spatial organization are directly reflected in Workscape’s interface metaphor. This metaphor contains only **a single, uniform data object**, known simply as a document. Documents are represented to the user as two-dimensional objects rendered in a three dimensional virtual workspace.” CHI ’94 Video at 2:55-3:17. • “The script language should be uniformly structured, in that **the only storage entity (object)** in the language **is a document consisting of attribute/value pairs**. Values may be atomic, such as strings, numbers, dates, or images, or they may be pointers (UID's) to other documents. Global objects may be stored as attributes in a universal "global" document which is visible to all scripts.” ’330 patent at 4:3-7. • “An attribute is a piece of data stored in a document. Each attribute has an attribute name and an attribute value. An attribute name uniquely identifies an attribute value within a document.” ’330 patent at 3:10-13. • “The project has the following specific design goals: First, to provide a **single, uniform computer application**, capable of presenting information to office workers **without regard to the information source or the form of its underlying representation**.” CHI ’94 Video at 1:12-1:28. • Additionally, see e.g., ’330 patent at 2:62-65; Lucas Depo. Tr. at 90:4-24.
1B	displaying browse cards related to	Lucas Workscape describes displaying browse cards related to respective ones of the information assets in a time-ordered stream, and glance views related to the document object models of the respective

	'999 Patent Claim Language	Disclosure
	respective ones of the information assets in a time-ordered stream, together with glance views related to the document object models of the respective displayed documents, said glance views being displayed essentially in real time in response to passing a cursor over respective ones of the browse cards. **<u>Claim Construction Order:</u>** **Stream** = a time ordered sequence of documents that functions as a diary of a person or an entity's electronic life and that is designed to have three main portions:	displayed documents, the glance views being displayed essentially in real time in response to passing a cursor over respective ones of the browse cards. See disclosure provided for claim element 32C in the '427 patent invalidity chart. (Ex. 27.)

	'999 Patent Claim Language	Disclosure
	past, present, and future. **Glance views** = an abbreviated presentation of a document. **Browse card** = a graphical depiction of a document, or a data unit. **Time-ordered stream** = a time-ordered sequence of documents that functions as a diary of a person or an entity's electronic life and that is designed to have three main portions: past, present, and future. **Essentially in real time** = without significant delay as perceived by a user.	