EXHIBIT 12

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Via E-mail

David Perlson, Esq.
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Re: April 4, 2012 Claim Construction Meet and Confer

Dear David:

Further to our claim construction meet and confer on April 4, 2012, I/P Engine is writing to
summarize our understandings as a result of the teleconference and respond to Defendants'
questions. If your understanding is materially different, please advise us.

I/P Engine understands that the parties are currently working from the potential terms to be
construed listed below. We understand that the Court has said that the parties will construe no
more than ten terms. Our hope is that we can reduce the list of terms on which the parties
disagree to no more than ten terms. If we are able to reach agreement, then I/P Engine will
withdraw its pending motion to compel or, in the alternative, motion for protective order.

1.   "relevance"
2.   "relevant"
3.   "scanning a network"
4.   "scanning system"
5.   "collaborative feedback data"
6.   "[feedback system for] receiving information found to be relevant to the query by
      other users"
7.   "user"
8.   "individual user" and "first user"
9.   "combining"
10.   "demand search"
11.   "informon"
12.   "searching"
13.   Antecedent basis
14.   Separate systems issue
15.   Order of steps for claim 25 of the '420 patent
16.   Order of steps for claim 26 of the '664 patent

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As we discussed during the meet and confer, I/P Engine is willing to consider compromise regarding certain proposed claim terms. The proposals contained below are made without prejudice in the event that the parties are unable to agree, in which event I/P Engine reserves its rights to revert to its prior proposed constructions.

Regarding various references to "user" (e.g., "first user," "individual user" and "particular user") both in the existing claims and in the parties' constructions for other terms, I/P Engine asked Defendants if they tied a special meaning to the word "particular" and if it meant something different than "a user" or "an individual user." Defendants expressed that they do not tie any special meaning to the word "particular" and they do not think it means something different from "a user" or "one user." It appears to us that both sides agree that "a particular user," "an individual user," "a user," or "one user" all refer to a single user. Thus, our proposal is that all references to "user" in the '420 patent refer consistently to "a/the individual user" and all references to "user" in the '664 patent consistently refer to "a/the first user." In each instance, this is how the "user" term already appears in the claims and the parties consistently understand its meaning. This appears favorable to having different phrasing for the term "user" within the claims (particular user/first user/individual user/and a user). Please let us know if Defendants agree to this proposal.

Regarding the definition of "user," the parties agree that there is no intention to have an unintended antecedent bases problem. The question remains whether the "user" in the claims has to be tied to any particular "network." To avoid this unintentional issue, I/P Engine alternatively proposes as a compromise that "a user" be construed to mean "an individual" according to its plain meaning and its use in the specification.

Regarding the term "relevance," I/P Engine understands that Defendants proposed construing "relevance" as "how well [an informon/information] satisfies the [individual/first] user's information need." I/P Engine agrees to this proposal. I/P Engine does not agree with Defendants' proposed construction of "relevant."

Regarding the term "receiving information found to be relevant to the query by other users," Defendants proposed "determining what information other users with similar interests or needs found to be relevant." I/P Engine proposes that this phrase be construed to mean "receiving information concerning what other users found to be relevant to the query." Please let us know if Defendants agree to I/P Engine's proposal.

Regarding antecedent basis, during the meet and confer, I/P Engine proposed construing each term to state "[term a] provides antecedent basis for [term b]." Defendants asserted that this was insufficient, as they wanted not only a confirmation that antecedent basis applied, but also wanted I/P Engine to confirm that certain consequences beyond those necessarily required by law would apply. To that, I/P Engine will not agree. I/P Engine proposes that the seven
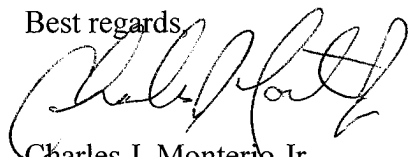
identified dyads be construed as follows: "informons" provides antecedent basis for "the informons"; "users" provides antecedent basis for "such users"; "a query" provides antecedent basis for "the query"; "a feedback system" provides antecedent basis for "the feedback system"; "a scanning system" provides antecedent basis for "the scanning system"; "a first user" provides antecedent basis for "the first user" and "a content-based filter system" provides antecedent basis for "the content-based filter system." I/P Engine is of the opinion that these statements along with a standard instruction on antecedent basis provides the jury sufficient clarity to understand these claims without importing additional unnecessary limitations.

Regarding the two ordering issues, I/P Engine offers the following comments. With respect to claim 25 of the '420 patent, the "combining pertaining feedback data with the content profile data" occurs after the "receiving collaborative feedback data from system users." No other limitations in claim 25 are required to be performed in a particular order. With respect to claim 26 of the '664 patent, the "receiving information" occurs before the "combining." In addition, the "combining" occurs before "filtering the combined information." No other limitations in claim 26 are required to be performed in a particular order.

Regarding the term "searching," I/P Engine proposes that no construction is necessary. If, however, the court determines that a construction is necessary, I/P Engine disagrees with Defendants' proposed construction and proposes that the term "searching" be construed according to its plain and ordinary meaning.

I/P Engine understands that Defendants are concurrently providing comments/proposals for terms 3, 4, 5, 9, 11, and 14 above. Please do not hesitate to contact us if you have any questions.

Best regards,

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CJM/JLF

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