

EXHIBIT 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC.

Plaintiff,

v.

AOL, INC., *et al.*,

Defendants.

Civil Action No. 2:11-cv-512

PROPOSED TERMS AND CLAIM ELEMENTS FOR CONSTRUCTION

I. INTRODUCTION

Defendants Google Inc., IAC Search & Media, Inc., Target Corporation, Gannett Company, Inc., and AOL, Inc. (collectively referred to as “Defendants”) hereby provide their Proposed Terms and Claim Elements for Construction.

Discovery in this action is still ongoing, as is Defendants’ investigation of Plaintiff’s claims. Defendants therefore expressly reserve the right to amend or supplement their identification of proposed terms and claim elements for construction, including their identification of claim elements governed by 35 U.S.C. section 112(6) in the event they obtain or discern additional information through further investigation, discovery, or disclosure from Plaintiff. Additionally, Plaintiff’s Infringement Contentions do not fairly apprise Defendants of Plaintiff’s infringement theories. Defendants therefore expressly reserve the right to amend or supplement their identification of proposed terms and claim elements for construction if and when Plaintiff serves adequate supplemental Infringement Contentions.

II. LIST OF TERMS FOR CONSTRUCTION

“informons relevant to a query”

“information relevant to a query”

“relevance to a query”

“relevance to at least one of the query and the first user”

“informon”

“scanning a network to make a demand search for informons relevant to a query from an individual user” / “a scanning system for searching for information relevant to a query associated with a first user in a plurality of users” / “wherein the searching step comprises scanning a network in response to a demand search for the information relevant to the query associated with the first user”

“demand search”

“searching [for information relevant to a query associated with a first user]”

“user”

“individual user”

“first user”

“content-based filter”

“content-based filter system” / “content-based filter for receiving informons from the scanning system” / “receiving the informons in a content-based filter system from the scanning system”

“content profile”

“content profile data”

“a feedback system for receiving collaborative feedback data from system users relative to informons considered by such users”

“feedback system for receiving information found to be relevant to the query by other users”

“collaborative feedback data”

“passive feedback data”

“combining the information from the feedback system with the information from the scanning system” / “combining the information found to be relevant to the query by other users with the searched information” / “filtering the combined information for relevance to at least one of the query and the first user”

“informons” / “the informons”

“users” / “such users”

“a query” / “the query”

“a feedback system” / “the feedback system”

“a scanning system” / “the scanning system”

“a first user” / “the first user”

“a content-based filter system” / “the content-based filter system”

“the scanning system”

The system for scanning, content-based filter system, and feedback system must all be different systems.

The scanning system, feedback system, and content-based filter system must all be different systems.

Order of steps of ‘420 Patent Claim 25.

Order of steps of ‘664 Patent Claim 26.

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