

# Exhibit 1

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March 29, 2012

## Via E-mail

Joshua Sohn  
Quinn Emanuel Urquhart & Sullivan, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111

Re: Claim Construction

Dear Joshua:

I write in response to your email dated March 27, 2012 regarding claim construction. As all parties recognize, the court will construe no more than ten terms. Defendants also acknowledge that the parties must agree to those ten terms. The court has not ordered construction of ten different concepts or ideas, it has ordered construction of ten terms. Defendants, however, continue to insist that various groupings of different phrases each amount to a single “term.” There is no legitimate basis for this assertion for the majority of Defendants’ proposed groups. I/P Engine is confident that the court will refuse to agree with Defendants’ proposal to classify as a single term phrases as different as “combining the information from the feedback system with the information from the scanning system” and “filtering the combined information for relevance to at least one of the query and the first user.”

I/P Engine remains committed to cooperatively narrowing the terms to ten to be construed by the court. To that end, we propose that there can be a reduction in total number of terms to construe by reducing some of Defendants phrases to focus on the contested terms. I/P Engine believes that the issues can be reduced by simplifying Defendants’ phrases so that the court is presented with actual disputes. In many instances, Defendants’ list presents large phrases that incorporate other constructions.

For example, the parties have identified three different phrases that share the claim term “combining.” The parties’ dispute is over the meaning (or definiteness) of the term “combining.” Defendants believe the common term “combining” is indefinite. The parties have proposed constructions for many of the other words in those phrases, such as “found to be relevant,” “the query,” and “other users.” Please let us know if Defendants agree to construing the term “combining.”

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The third phrase in Defendants' "group 6," "filtering the combined information," is different from "combining," and does not need to be construed, because filtering is addressed elsewhere, and "combined information" follows from the construction of "combining."

With respect to the terms in Defendants' "group 2," it appears that the relevant portion of the first two terms is "scanning a network." I/P Engine has proposed constructions for "scanning" and "network." I/P Engine is agreeable to presenting for construction the phrase "scanning a network." Please advise if Defendants agree. The third limitation of "group 2" recites "a scanning system for searching for information," and can be separately construed. Please let us know if Defendants agree.

Regarding the term "informon," I/P Engine proposed "information entities of potential or actual interest to a user." Defendants proposed "information entity of potential or actual interest to a particular user." You have asked why I/P Engine is using the plural of the phrase "entities." I/P Engine's usage of a plural phrase is intended to be consistent with the "informons" (plural) recited in the claim. It appears that the parties agree that an "informon" is singular, and "informons" are plural.

The parties currently dispute whether Defendants' use of the phrase "particular user" in their proposed construction of informon is proper. The claim recites "individual user," not "particular user." I/P Engine does not agree with the inclusion of "particular user" as proposed by Defendants. Please explain Defendants' basis for the use of the word "particular" in the definition of "informon." Defendants state that this is proper "so as the information is tied to a particular user, not just a user." Defendants' statement, however, is incomprehensible. What do the Defendants contend to be the difference between tying information to "a particular user" as opposed to "a user"? Do Defendants contend that a "particular user" is meaningfully different from "an individual user" (as recited in the claim) in this context?

Regarding "demand search," I/P Engine believes that Defendants' construction "search engine query" is unclear. I/P Engine's definition is taken from the specification, which describes a demand search as a one-shot search performed upon a user request. Defendants' phrase "search engine query," on the other hand, does not appear to be used in the specification with reference to the "demand search."

Regarding the term "searching [for information relevant to a query associated with a first user]," Defendants have proposed the phrase "issuing a search engine query" as a construction of the term "searching." This proposal imports additional and unnecessary limitations based solely on the word "searching." I/P Engine does not believe that the ordinary phrase "searching" needs to be construed. If Defendants continue to insist on construing "searching" as one of the ten terms for construction, then I/P Engine proposes that it be construed according to its plain and ordinary meaning.

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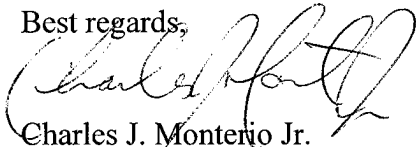
Regarding the term “collaborative feedback data,” while our proposed definitions are similar, I/P Engine believes its definition more closely tracks the language cited by both parties from the ‘420 patent (col. 4, ll. 26-29), and is therefore the more appropriate construction. Please let us know if Defendants agree to I/P Engine’s construction.

Regarding the various “group 1” terms, I/P Engine continues to believe it is proper to construe the core terms (“relevant” and “relevance”) and not the entire phrases. Indeed, there are inconsistencies in Defendants’ constructions of ancillary terms in these phrases that cause unnecessary confusion. Please let us know if Defendants are amenable to providing constructions of these two terms.

Regarding the remaining terms/issues, I/P Engine will respond at a later date.

If Defendants cannot agree to simplifying the issues by focusing on the common terms, then I/P Engine does not see how all of the currently disputed claim terms can remain under ten. Accordingly, I/P Engine requests that the parties meet and confer to prioritize their respective term lists to establish a list of ten terms to be construed pursuant to the court’s order. We also request a meet and confer to discuss the parties’ differences regarding their various proposals.

Best regards,



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CJM/JLF

cc: Stephen E. Noona  
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