

EXHIBIT B

Plaintiff’s Proposed Constructions with Supporting Intrinsic and Extrinsic Evidence

	Claim Term	Plaintiff’s Proposed Construction	Plaintiff’s Intrinsic and Extrinsic Evidence
1a.	“scan[ning] a network” (‘420 claims 10, 25)	looking for items on two or more connected computers	<p>A spider system 46C scans a network 44C to find informons for a demand search, and to find informons with continued network scanning for existing wires. ‘664, col. 25, ll. 41-42; ‘420, col. 25, ll. 39-41; <i>see also</i> FIG. 9.</p> <p>A spider system 68C continuously scans a network 70C for informons. . . . ‘664, col. 26, ll. 16-17; ‘420, col. 26, ll. 14-15.</p> <p>Scan – 1: to read or mark so as to show metrical structure, 2: to examine by point-by-point observation or checking, a: to investigate thoroughly by checking point by point and often repeatedly, b: to glance from point to point of often hastily, casually, or in search of a particular item <i>Merriam-Webster’s Collegiate Dictionary</i>, 10th ed., 1998.</p> <p>Scan – . . . <i>Computer Technology</i>. 1. to examine sequentially each item in a list, each record in a file, each point of a display, or each input or output channel of a communication link. <i>Academic Press Dictionary of Science and Technology</i>, 1992.</p> <p>Scan – . . . (3) To sequentially search a file. <i>The Computer Desktop Encyclopedia</i>, 2d ed., 1999.</p>

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			<p>In general, a data stream is conveyed through network 3, which can be a global internetwork. A skilled artisan would recognize that apparatus 1 can be used with other types of networks, including, for example, an enterprise-wide network, or "intranet." Using network 3, User #1 (5) can communicate with other users, for example, User #2 (7) and User #3 (9), and also with distributed network resources such as resource #1 (11) and resource #2 (13). '664, col. 6, ll. 48-56; '420, col. 6, ll. 40-49.</p> <p>Network – 1) An arrangement of objects that are interconnected, 2) In communications, the transmission channels interconnecting all client and server stations as well as all supporting hardware and software. <i>The Computer Glossary</i>, 8th ed., 1998.</p> <p>Network – a set of computers connected together. <i>Dictionary of Computer and Internet Terms</i>, 6th ed., 1998.</p> <p>Network – 1. A series of points connected by communications channels. . . . 4. In IBMS's SNA, an interconnected group of nodes; a user application network in data processing. 5. A group of computers connected together to facilitate the transfer of information. <i>Dictionary of Communications Technology</i>, 2d ed., 1995.</p> <p>Network – (1) An arrangement of objects that are interconnected. See LAN and network database. <i>The Computer Desktop Encyclopedia</i>, 2d ed., 1999.</p>

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1b.	“a scanning system” (‘664 claim 1)	a system used to search for information	A scanning system for searching for information relevant to a query. . . . ‘664, col. 27, l. 28 (from independent claim 1). The scanning system further comprises scanning a network upon a demand search request. ‘664, col. 28, ll. 49-51 (from dependent claim 24).
2a.	“relevance to at least one of the query and the first user” (‘664 claims 1, 26)	no further construction necessary beyond other terms	The “relevance” of a particular informon broadly describes how well it satisfies the user’s information need. ‘664, col. 4, ll. 12-13; ‘420, col. 4, ll. 5-6.
2b.	“[informons/information] relevant to a query” (‘420 claims 10, 25; ‘664 claims 1, 26)	[informons/information] having relevance a query	The “relevance” of a particular informon broadly describes how well it satisfies the user’s information need. ‘664, col. 4, ll. 12-13; ‘420, col. 4, ll. 5-6. The search engine system employs a regular search engine to make one-shot or demand searches for information entities which provide at least threshold matches to user queries. ‘664, Abstract; ‘420, Abstract. A spider system 68C continuously scans a network 70C for informons providing a threshold-level match for content based profiles (i.e., preprocessing profiles at the top level of the preferred multi-level filter structure, at least one of which reflects the content profile of a current wire query). ‘420 at col. 26, ll. 10-20.
3.	“combining” (‘420 claims	uniting into a single number or	A search return processor 48C receives either demand search informons or wire search informons passed by the content-

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	10, 25; '664 claims 1, 26)	expression	<p>based filter structure 40C according to the operating mode of the latter, and includes an informon rating system which is like that of FIG. 6. The informon rating system combines content-based filtering data with collaborative feedback rating data, from users through a feedback processor 50C at least in the wire search mode and, if desired, in the demand search mode. '664, col. 25, ll. 55-63; '420, col. 25, ll. 52-61; <i>see also</i> '664, col. 14, l. 43 – col. 19, l. 38; '420, col. 14, l. 40 – col. 19, l. 36 (describing the informon rating system of FIG. 6).</p> <p>A feedback processor 74C is structured like the mindpool system of FIG. 7 to provide collaborative feedback data for integration with the content-based data in the measurement of inform on relevancy by the filter 66C. An informon rating structure like that of FIG. 6 is employed for this purpose. '664, col. 26, ll. 25-30; '420, col. 26, ll. 24-28; <i>see also</i> '664, col. 14, l. 43 – col. 19, l. 38; '420, col. 14, l. 40 – col. 19, l. 36 (describing the informon rating structure of FIG. 6); <i>see, e.g.,</i> '420, col. 26, ll. 15-20. (“preprocessing profiles at the top level of the preferred multi-level filter structure, at least one of which reflects the content profile of a current wire query”).</p> <p>Combine – 1: a: to bring into such close relationship as to obscure individual characters: MERGE; b: to cause to unite into a chemical compound; c: to unite into a single number or expression . . . 2: INTERMIX, BLEND; 3: to possess in combination . . . 1: a: to become one; b: to unite to form a chemical compound; 2: to act together . . . <i>Merriam-</i></p>

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			<i>Webster's Collegiate Dictionary</i> , 10th ed., 1998.
4.	demand search ('420 claims 10, 25)	one-time search performed upon a user request	<p>The search engine system employs a regular search engine to make one-shot or demand searches for information entities which provide at least threshold matches to user queries. '664 Abstract; '420 Abstract; <i>see also</i> '664, col. 23, ll. 44-51; '420, col. 23, ll. 42-49.</p> <p>Demand search results can be returned if no wire exists for an input query. Otherwise, wire search results are returned if a wire does exist, or collaborative ranking data can be applied from the wire filter structure to improve the results of the demand search from the regular search engine. '664, col. 23, ll. 56-60; '420, col. 23, ll. 54-58.</p> <p>In operation, a user enters a query and a corresponding "wire" is established, i.e., the query is profiled in storage on a content basis and adaptively updated over time, and informons obtained from the network are compared to the profile for relevancy and raking. '420, col. 1, ll. 56-60.</p>
5a.	"collaborative feedback data" ('420 claims 10, 25)	information concerning what informons other users with similar interests or needs found to be relevant	<p>Collaborative filtering, on the other hand, is the process of filtering informons, e.g., documents, by determining what informons other users with similar interests or needs found to be relevant. '664, col. 4, ll. 33-36; '420, col. 4, ll. 26-29.</p> <p>Collaborative filtering employs additional data from other users to improve search results for an individual user for whom a search is being conducted. '664, col. 24, ll. 39-41; '420, col. 24, ll. 37-39; <i>see also</i> '664, col. 1, ll. 50-54; '420,</p>

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			col. 1, ll. 41-45.
5b.	“[feedback system for] receiving information found to be relevant to the query by other users” (‘664 claim 1, 26)	No construction necessary - or - [feedback system for] receiving information concerning what other users found to be relevant to the query	Figure 9.
6.	individual user/first user (‘420 claims 10, 25; ‘664 claims 1, 26)	no construction necessary	
7.	Order of Steps (‘420 claim 25; ‘664 claim 26)	No “construction” is necessary; if there is any order, it is reflected in the claim language; otherwise, no order is required.	
8.	separateness of the claimed systems (‘420 claim 10, ‘664 claim 1)	The claim language does not require the scanning system, content-based filter system, and feedback system of claim 1 of the ‘664 patent or the claimed system for scanning, content-based filter system, and feedback system of claim 10 of the ‘420 patent to be the same or different “systems.”	An artisan would recognize that one or more of the processors 52-55 could be combined functionally so that the actual number of processors used in the apparatus 50 could be less than, or greater than, that illustrated in FIG. 2. For example, in one embodiment of the present invention, first processor 52 can be in a single microcomputer workstation, with processors 53-55 being implemented in additional respective microcomputer systems. Suitable microcomputer systems can include those based upon the Intel® Pentium-Pro™ microprocessor. In fact, the flexibility of design presented by the invention allows for extensive scalability of apparatus 50, in which the number of users, and the

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			<p>communities supported may be easily expanded by adding suitable processors. As described in the context of FIG. 1, the interrelation of the several adaptive profiles and respective filters allow trends attributable to individual member clients, individual users, and individual communities in one domain of system 51 to be recognized by, and influence, similar entities in other domains, of system 51 to the extent that the respective entities in the different domains share common attributes. '664, col. 10, ll. 8-28; '420, col. 10, ll. 3-23.</p> <p>Generally, basic search engine system structures of the invention are preferably embodied with the use of a programmed computer system. '664, col. 24, ll. 36-38; '420, col. 24, ll. 34-36.</p>
9a.	"informons" / "the informons" ('420 Claims 10, 25)	"informons" provides antecedent basis for "the informons"	
9b.	"users" / "such users" ('420 claims 10, 25)	"users" provides antecedent basis for "such users"	
9c.	"a query" / "the query" ('420 claims 10, 25; '664 claims 1, 26)	"a query" provides antecedent basis for "the query"	
9d.	"a feedback system" / "the feedback system" ('420	"a feedback system" provides antecedent basis for "the	

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	claim 10; '664 claim 1)	feedback system”	
9e.	“a scanning system” / “the scanning system” ('664 claim 1)	“a scanning system” provides antecedent basis for “the scanning system”	
9f.	“a first user” / “the first user” ('664 claims 1, 26)	“a first user” provides antecedent basis for “the first user”	
9g.	“a content-based filter system” / “the content-based filter system” ('664 claims 1, 21)	“a content-based filter system” provides antecedent basis for “the content-based filter system”	