

EXHIBIT C

Defendants' Proposed Constructions with Supporting Intrinsic and Extrinsic Evidence

	Claim Term	Defendants' Construction	Defendants' Intrinsic and Extrinsic Evidence
1.	"[feedback system for] receiving information found to be relevant to the query by other users" ('664 claim 1, 26)	[system using a process of filtering information by] determining what information other users with similar interests or needs found to be relevant	2:20-25; ¹ 23:39-42; Abstract
	"collaborative feedback data" ('420 claims 10, 25)	Data from users with similar interests or needs regarding what informs such users found to be relevant	16:32-33; 24:37-38; 29-40:41
2.	"scan[ning] a network" ('420 claims 10, 25)	spider[ing] or crawl[ing] a network	1:23-24; 1:45-61; 25:39-40; 26:14-15 Ira S. Nathanson, <i>Internet Infoglut and Invisible Ink</i> , 12 HARV. J. L. & TECH. 43, 61 (1998); Eric W. Gutttag, <i>Applying the Printed Publication Bar in the Internet Age</i> , 16 VA. J. L. & TECH. 66, *12 (2011)
	"a scanning system" ('664 claim 1)	a system used to scan a network	29:34-37 RANDOM HOUSE UNABRIDGED DICTIONARY (2 nd Ed. 1993) at 1727

¹ While the '420 and '664 specifications are substantively identical, all citations are taken from the '420 specification unless otherwise noted

	Claim Term	Defendants’ Construction	Defendants’ Intrinsic and Extrinsic Evidence
3.	“combining” (‘420 claims 10, 25; ‘664 claims 1, 26)	plain meaning; alternatively, bringing together	1:10-26; 14:56-58; 25:9-26:7; Fig. 8; ‘664 claims 1, 5, 26 RANDOM HOUSE WEBSTER’S COLLEGE DICTIONARY (1999) at 263; Plaintiff’s Responses and Objections to Google’s Third Set of Interrogatories at 11
4.	separateness of the claimed systems (‘420 claim 10, ‘664 claim 1)	The claimed “system for scanning a network,” “content-based filter system,” and “feedback system” of ‘420 claim 10 must be different systems The claimed “scanning system,” “feedback system,” and “content-based filter system” of ‘664 claim 1 must be different systems	‘664 claim 1, ‘420 claim 10; 10:10-12 WEBSTER’S NEW WORLD DICTIONARY OF COMPUTER TERMS (8 th Ed. 2000) at 344
5.	demand search (‘420 claims 10, 25)	search engine query	23:45-51; 23:65-24:8; 25:19-20; 25:27-28; Abstract
6.	individual user/first user (‘420 claims 10, 25; ‘664 claims 1, 26)	particular user	‘664 claim 1; 25:11-12; 26:11-12
7.	“relevance to at least one of the query and the first user” (‘664 Claims 1, 26)	how well information satisfies the information need of at least one of the query and the first user	4:5-6
	“[informons/information] relevant to a query” (‘420 Claims 10, 25; ‘664	[informons/information] that satisfy the individual user’s information need	4:5-6

	Claim Term	Defendants' Construction	Defendants' Intrinsic and Extrinsic Evidence
	Claims 1, 26)	expressed in the query	
8.	Order of Steps ('420 claim 25; '664 claim 26)	'420 Claim 25: Step [a] must be performed before Step [b]; Steps [b] and [c] must be performed before Step [d] '664 Claim 26: Steps [a] and [b] must be performed before Step [c]; Step [c1] must be performed before Step [c2]	'420 claim 25; '664 claim 26
9.	"informons" / "the informons" ('420 claims 10, 25)	"informons" and "the informons" are the same informons	
	"users" / "such users" ('420 claims 10, 25)	"users" and "such users" are the same users	
	"a query" / "the query" ('420 claims 10, 25; '664 claims 1, 26)	"a query" and "the query" are the same query	
	"a feedback system" / "the feedback system" ('420 claim 10; '664 claim 1)	"a feedback system" and "the feedback system" are the same feedback system	
	"a scanning system" / "the scanning system" ('664 claim 1)	"a scanning system" and "the scanning system" are the same scanning system"	
	"a first user" / "the first user" ('664 claims 1, 26)	"a first user" and "the first user" are the same first user	
	"a content-based filter system" / "the content-	"a content-based filter system" and "the content-	

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	based filter system” ('664 claims 1, 21)	based filter system” are the same content-based filter system	