

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

I/P ENGINE, INC.,

PLAINTIFF,

v.

AOL, INC., GOOGLE INC., IAC SEARCH &
MEDIA, INC., GANNETT COMPANY,
INC., and TARGET CORPORATION,

Defendants.

No. 2:11-cv-00512-RAJ-FBS

NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282, Defendants AOL, Inc., Google Inc., IAC Search & Media, Inc., Gannett Co., Inc., and Target Corp. (collectively “Defendants”) have previously provided notice to Plaintiff I/P Engine, Inc. (“I/P Engine”) of the country, number, date, and name of the patentee of any patent; the title, date, and page numbers of any publication to be relied upon as anticipation or obviousness of the patents-in-suit or as showing the state of the art; and the name and address of any person who may be relied upon as the prior inventor or as having prior knowledge of or as having previously used or offered for sale the invention of the patents-in-suit during the course of this action in the manner indicated below.

U.S. Patent Nos. 6,314,420 (claims 10, 14, 15, 25, 27, 28) and 6,775,664 (claims 1, 5, 6, 21, 22, 26, 28, 38):

Patents, Publications, and Prior Inventors

- U.S. Patent No. 5,724,567, Daniel E. Rose et al., March 3, 1998;
- U.S. Patent No. 5,794,237, Robert Cecil Gore, Jr., August 11, 1998;
- U.S. Patent No. 5,835,087, Frederick S.M. Herz et al., November 10, 1998;

- U.S. Patent No. 5,855,015, Yoav Shoham, December 29, 1998;
- U.S. Patent No. 6,006,218, John S. Breese et al., December 21, 1999;
- U.S. Patent No. 6,006,222, Gary Culliss, December 21, 1999;
- U.S. Patent No. 6,185,558 B1, Dwayne Bowman et al., February 6, 2001;
- U.S. Patent No. 6,202,058 B1, Daniel E. Rose et al., March 13, 2001;
- U.S. Patent No. 6,421,675 B1, Grant James Ryan et al., July 16, 2002;
- Joshua Alspector et al., *Feature-Based and Clique-Based User Models for Movie Selection: A Comparative Study*, User Modeling and User-Adapted Interaction, 1997;
- Marko Balabanovic & Yoav Shoham, *Fab: Content-Based, Collaborative Recommendation*, Communications of the ACM, no. 3, Mar. 1997;
- David Goldberg et al., *Using Collaborative Filtering to Weave an Information Tapestry*, Communications of the ACM, no. 35, Dec. 1992;
- Yezdezard Zerxes Lashkari, *Feature Guided Automated Collaborative Filtering*, (Jul. 25, 1995) (masters dissertation, Massachusetts Institute of Technology).
- Shoshana Loeb, *Architecting Personalized Delivery of Multimedia Information*, Communications of the ACM, no. 12, Dec. 1992;
- Paul Resnick et al., *GroupLens: An Open Architecture for Collaborative Filtering of Netnews*, Proceedings of ACM 1994 Conference of Computer Supported Cooperative Work, 1994.
- Avery, C. and Zeckhauser, R. (1997). *Recommender Systems for Evaluating Computer Messages*, Communications of the ACM, March 1997, Vol. 40, No. 3.
- Kautz, H., Selman, B., and Shah, M. (1997). *Referral Web: Combining Social Networks and Collaborative Filtering*, Communications of the ACM, March 1997, Vol. 40, No. 3.

- Konstan, J., Miller, B., Maltz, D., Herlocker, J., Gordon, L., and Riedl, J. (1997). *GroupLens: Applying Collaborative Filtering to Usenet News*, Communications of the ACM, March 1997, Vol. 40, No. 3.
- Resnick, P. and Varian, H. (1997). *Recommender Systems*, Communications of the ACM, March 1997, Vol. 40, No. 3.
- Riedl, J., Konstan, J., and Vrooman, E. (2002). *WORD OF MOUSE* (Business Plus 2002).
- Rucker, J. and Polanco, M. (1997). *Siteseer: Personalized Navigation for the Web*, Communications of the ACM, March 1997, Vol. 40, No. 3.
- Terveen, L., Hill, W., Amento, B., McDonald, D., and Creter, J. (1997). *PHOAKS: A System for Sharing Recommendations*, Communications of the ACM, March 1997, Vol. 40, No. 3.
- Direct Hit Technologies: Stop Looking and Start Finding!, white paper (May 7, 1998, produced at CG0000076-108)
- Direct Hit (undated Powerpoint presentation, produced at GC000005-21)
- Forbes magazine, “Search,” (Sept. 13, 1999, p. 35)
- Forbes magazine, “!&#\$.com,” (August 23, 1999, pp. 76-77)
- Direct Hit screenshot (October 1999, produced at GC0000189)
- Amazon.com and Amazon.com’s online marketplace
- Directhit.com and Direct Hit Technologies
- Ruben Ortega, reachable through Theo Angelis of K&L Gates LLP, 925 4th Ave., Suite 2900, Seattle, WA 98104.
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The disclosure set forth in this notice is strictly for purposes of the asserted claims in the asserted patents that are presently at issue in this litigation. In the event additional claims and/or patents become relevant, Defendants reserve their right to amend this notice accordingly.

DATED: September 14, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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