

# EXHIBIT 2

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

I/P ENGINE, INC.,

Plaintiff,

v.

AOL, INC. et al.,

Defendants.

Civ. Action No. 2:11-cv-512

**DEFENDANT GOOGLE INC.'S THIRD SUPPLEMENTAL OBJECTIONS AND  
RESPONSES TO PLAINTIFF I/P ENGINE, INC.'S FIRST SET OF  
INTERROGATORIES (INTERROGATORY NO. 8)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Google Inc. (“Google”) hereby further objects and responds in writing to I/P Engine, Inc.’s (“I/P Engine”) First Set of Interrogatories as served on November 7, 2011.

**GENERAL OBJECTIONS**

Google hereby incorporates by reference and re-states each General Objection from Google’s First and Second Supplemental Objections and Responses to I/P Engine’s First Set of Interrogatories.

**STATEMENT ON SUPPLEMENTATION**

Google’s investigation in this action is ongoing, and Google reserves the right to rely on and introduce information in addition to any information provided herein at the trial of this matter or in other related proceedings. Google has yet to receive complete discovery responses from I/P Engine. In addition, I/P Engine has yet to identify in a coherent way how it contends Google infringes the asserted claims of the Patents-in-Suit. Google anticipates that facts it learns

later in the litigation may be responsive to one or more of the interrogatories and Google reserves its right to supplement these interrogatories at appropriate points throughout this litigation without prejudice and/or to otherwise make available to I/P Engine such information. Google also reserves the right to change, modify or enlarge the following responses based on additional information, further analysis, and/or in light of events in the litigation such as rulings by the Court. Google reserves the right to rely on or otherwise use any such amended response for future discovery, trial or otherwise.

### **SPECIFIC OBJECTIONS AND RESPONSES**

Google expressly incorporates the above objections as though set forth fully in response to each of the following individual interrogatories, and, to the extent that they are not raised in the particular response, Google does not waive those objections.

#### **INTERROGATORY NO. 8**

Identify and describe each basis for Google's contention that the claims of the '420 and '664 Patents are invalid including, but not limited to, all facts, dates, documents, communications and/or events, including prior art, which Google contends are pertinent thereto, and identify the persons having the most knowledge of such facts, dates, documents, communications and/or events.

#### **RESPONSE TO INTERROGATORY NO. 8:**

Google incorporates here in response to this interrogatory its General Objections above by this reference. Google objects to this interrogatory on the grounds that: (i) it is overbroad and unduly burdensome; (ii) it is vague and ambiguous with respect to the phrase "all facts, dates, documents, communications and/or events;" (iii) it seeks information that is irrelevant,

immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Google further objects to this interrogatory on the ground that it seeks proprietary, trade secret or other confidential or competitively sensitive business information; and (iv) it is compound and/or is comprised of subparts constituting more than one interrogatory in that it seeks information about '420 and '664 Patents. Google will only produce such relevant, non-privileged information subject to adequate protections for Google's confidential, trade secret and/or proprietary business or technical information via a protective order entered by the Court in this action.

Subject to the foregoing general and specific objections, Google responds that in accordance with Federal Rule of Civil Procedure 33(d), all or part of the non-objectionable discovery sought may be obtained from documents that will be produced. Google will rely on documents produced in this action and will identify those documents to the extent reasonable after the time they are produced. Google will supplement its response to Interrogatory No. 8 to reference relevant documents to the extent reasonable.

Google further responds that the following references, either alone or in conjunction with the knowledge of one of skill in the art, render one or more of the asserted claims invalid:

- “Content-Based, Collaborative Recommendation” by Balabanovic et al.
- “Feature-based and Clique-based User Models for Movie Selection: A Comparative Study” by Alspector et al.
- “Using Collaborative Filtering to Weave an Information Tapestry” by Goldberg et al.
- “Architecting Personalized Delivery of Multimedia Information” by Loeb
- U.S. Patent No. 5,794,237 to Gore
- U.S. Patent No. 5,835,087 to Herz
- U.S. Patent No. 5,855,015 to Shoham
- U.S. Patent No. 6,202,058 to Rose

- U.S. Patent No. 5,724,567 to Rose et al.
- U.S. Patent No. 6,006,218 to Breese et al.
- U.S. Patent No. 6,421,675 to Ryan et al.
- U.S. Patent No. 5,963,940 to Liddy et al.

Google further asserts that the asserted claims of the '420 and '664 patent, as apparently interpreted by Plaintiff, are invalid for lack of enablement and written description. In particular, neither patent describes or enables using collaborative filtering or any other form of feedback on a demand search. Rather, the patents only describe and enable using collaborative filtering with persistent or "wire" search results.

Google reserves its right to supplement, revise or render more specific its responses to Interrogatory No. 8, including during expert discovery.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:

Subject to the foregoing general and specific objections, Google identifies the following documents previously produced by Google as showing that the asserted claims from the '420 and '664 patents are invalid: G-IPE-0217615 - G-IPE-0217641, G-IPE-0217642 - G-IPE-0217648, G-IPE-0217649 - G-IPE-0217672, G-IPE-0217673 - G-IPE-0217683, G-IPE-0217684 - G-IPE-0217693, G-IPE-0217694 - G-IPE-0217708, G-IPE-0217709 - G-IPE-0217756, G-IPE-0217757 - G-IPE-0217770, G-IPE-0217771 - G-IPE-0217780, G-IPE-0217781 - G-IPE-0217796, G-IPE-0217797 - G-IPE-0217813, G-IPE-0217814 - G-IPE-0217870, G-IPE-0217871 - G-IPE-0217956, G-IPE-0217957 - G-IPE-0217999, and G-IPE-0218000 - G-IPE-0218013.

Google served its Preliminary Invalidity Contentions on January 24, 2012. Google hereby incorporates those Contentions by reference and submits that its response to this

Interrogatory also may be derived from those disclosures. Google reserves the right to amend and/or supplement its invalidity contentions if and when further information becomes available.

Google reserves its right to supplement, revise or render more specific its responses to Interrogatory No. 8, including during expert discovery.

## SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8

Google incorporates its General Objections, Specific Objections to Interrogatory No. 8, and prior responses to Interrogatory No. 8 as if fully set forth herein.

Subject to the foregoing General and Specific Objections, Google further states that the following additional prior art references, either alone or in conjunction with the knowledge of one of skill in the art, render one or more of the asserted claims invalid:

- U.S. Patent No. 6,185,558 to Bowman et al. (“Bowman”)
- U.S. Patent No. 6,006,222 to Culliss (“Culliss”)
- U.S. Patent No. 6,421,675 to Ryan et al. (“Ryan”)

Claim charts illustrating how Bowman, Culliss, and Ryan invalidate the asserted claims are attached hereto as Exhibits A-7, A-8, and A-9.<sup>1</sup>

Plaintiff alleged that various references from Defendants’ Preliminary Invalidity Contentions do not filter informons “for relevance to the query” or receive information “found to be relevant to the query by other users,” on the theory that these references filter and rank for relevance to the user instead of relevance to the query. *See, e.g., I/P Engine’s Response to Google’s Interrogatory No. 13 at 6* (stating that the Rose reference “ranks items based on how

---

<sup>1</sup> Google further attaches to this interrogatory response, as Exhibits A-1 through A-6, amended versions of the claim charts that were first presented as Exhibits to Defendants’ Preliminary Invalidity Contentions.

well their content matches a profile of interests stored for each user, not a query received from an individual user”); 14 (“Nor does Balabanovic disclose ‘receiving information found to be relevant to the query by other users.’ Balabanovic’s feedback is an indication of how well a user liked an item.”)

Defendants further provide invalidity charts for Bowman, Culliss, and Ryan, which filter information “for relevance to the query” and “receiv[e] information found to be relevant to the query by other users.” *See* Exhibits A-7, A-8, A-9. For example, Bowman accepts a search query from a user and generates a body of search results that match the query. (*See* Bowman at Abstract; 5:31-32; claim 28). Bowman then gives each search result a ranking score based on how often prior users *who had entered the same query* had selected that particular result. (*See id.* at Abstract; 2:30-35; 5:32-35; claim 28). Items that were selected more often get higher ranking scores, and the items with the highest ranking scores are presented to the user. (*Id.* at 9:60-64). (As detailed in the attached charts, Bowman, Culliss, and Ryan also use content-based filtering with their feedback-based filtering.)

Notably, while I/P Engine sought to distinguish the prior art references on the alleged ground that they do not filter information “for relevance to the query” or “receiv[e] information found to be relevant to the query by other users,” it has essentially ignored these limitations in its Infringement Contentions. For example, I/P Engine’s Infringement Contentions state that Google AdWords meets the ‘664 claim element of “receiving information found to be relevant to the query by other users” because AdWords allegedly records an advertisement’s historical click-through rate and allegedly uses this click-through rate as a component of the advertisement’s Quality Score. (*See* I/P Engine, Inc.’s Second Preliminary Infringement Contentions against Google at 24-25). Even if these assertions are true—and they are not—I/P Engine does not even

try to explain how historical click-through rate constitutes “information found to be relevant to the query by other users.” Rather, I/P Engine’s Infringement Contentions assert that an advertisement’s historical click-through rate is the overall rate that the ad was clicked on by all AdWords users, not just users who had entered the same query. Thus, I/P Engine’s own Infringement Contentions fail to even allege how AdWords meets the limitation that I/P Engine asserts was missing from Defendants’ prior invalidity charts, *i.e.* a measure of how relevant users found an advertisement to be for any given query.

\* \* \*

Google also notes that the Court’s *Markman* Order of June 15, 2012 (Dkt. 171) held that “scanning a network” means “looking for or examining items in a network” and “a scanning system” means “a system used to search for information.” (*See id.* at 23). Under this construction, the process of “scanning” is not limited to spidering or crawling, as Defendants had originally proposed, expanding the relevant art for this element further. Similarly, the *Markman* Order also construed “collaborative feedback data” and “[feedback system for] receiving information found to be relevant to the query by other users” so as not to require that the feedback or received information comes from users with similar interests or needs, again expanding the art relevant to this limitation. (*See id.*) Google’s investigation continues as to relevant prior art under the Court’s constructions and Google reserves its rights to supplement its response based on additional prior art discovered under that investigation.

Further, the Court has construed “demand search” as “a single search engine query performed upon a user request,” and has construed “query” as a “request for search results.” (*Markman* Order at 8, 23). The Court construed “scanning a network” as “looking for or examining items in a network.” (*Id.* at 23). Thus, the element of “scanning a network to make a



demand search for informons” requires looking for or examining items to make a request for search results, which makes no sense. The ‘420 specification also does not describe how to look for or examine items to make a request for search results, nor does it enable one of skill in the art to carry out this step. Accordingly, claims 10, 25, and their dependents are invalid for indefiniteness, lack of written description, and lack of enablement.

Google understands that I/P Engine will supplement its Infringement Contentions by July 2, 2012, and Google reserves its rights to supplement this response based on I/P Engine’s forthcoming supplemental Infringement Contentions.

Dated: July 2, 2012

By: /s/ David A. Perlson  
Stephen E. Noona  
KAUFMAN & CANOLES, P.C.  
150 West Main Street  
Post Office Box 3037  
Norfolk, VA 23514  
Telephone: (757) 624.3000  
Facsimile: (757) 624.3169

David A. Perlson  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700  
*Counsel for Defendant* GOOGLE INC.

**CERTIFICATE OF SERVICE**

On July 2, 2012, I caused to be served the foregoing *Defendant Google Inc.'s Third Supplemental Objections and Responses to Plaintiff I/P Engine, Inc.'s First Set of Interrogatories* by email, on Plaintiff's counsel of record.

/s/ Joshua L. Sohn  
Joshua L. Sohn

**Exhibit A-8**

**U.S. Patent Claim Charts for the asserted '664 and '420 patents against U.S. Patent No. 6,006,222 ("Culliss")**

To the extent that either I/P Engine argues or the Court finds that this reference does not explicitly teach certain limitations in the asserted claims, such limitations would have been inherent and/or obvious. This invalidity chart is based in whole or in part on Defendants' present understanding of the asserted claims, and I/P Engine's apparent construction of the claims in their Infringement Contentions. Defendants are not adopting I/P Engine's claim construction, nor admitting to the accuracy of any particular claim construction. To the extent that I/P Engine's apparent claim construction or applications thereof are reflected in this invalidity chart, nothing herein should be construed as an admission that Defendants agree with I/P Engine's apparent claim construction or I/P Engine's application of that claim construction in its Infringement Contentions.

Defendants identification of this publication as prior art herein under 35 U.S.C. §§102(a), (b), (e), and/or (g) and §103 includes the publication itself as well as the use of the products and systems described therein. Although Defendants' investigation continues, information available to date indicates that such products and systems were (1) known or used in the country before the alleged invention of the claimed subject matter of the asserted claims, (2) were in public use and/or on sale in this country more than one year before the filing date of the patent, and/or (3) were invented by another who did not abandon, suppress, or conceal, before the alleged invention of the claimed subject matter of the asserted claim. Upon information and belief, these prior art products and systems and their associated references anticipate and/or render obvious each of the asserted claims.

Defendants reserve all rights to amend their Invalidity Contentions if I/P Engine amends its Infringement Contentions.

<b>Claim language of U.S. Patent No. 6,775,664 ("the '664 Patent")</b>	<b>Disclosure in Culliss</b>
<b>1.</b> [preamble] A search system comprising:	<i>See Culliss at 4:10-26 (explaining that Culliss' system accepts a search query from a user and returns squibs of articles that match the query)</i>  "As users enter search queries and select articles, the scores are altered. The scores are then used in subsequent searches to organize the articles that match a search query." Culliss at Abstract.

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent’)	Disclosure in Culliss
	<p>"The present invention relates to search engines, and more particularly pertains to a method for organizing information by monitoring the search activity of users." Culliss at 1:17-20.</p> <p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:</p> <p>Herz at 6:42-58.</p> <p>Lashkari at 59.</p> <p>Tapestry at 63.</p> <p>Balabanovic at 69-70.</p> <p>GroupLens at 2.</p> <p>Rose at 2:51-55.</p> <p>Bowman at 5:31-32; claim 28[a-b]</p> <p>Ryan at Abstract, 1:8-10, 1:20-23.</p>
[a] a scanning system for searching for information relevant to a query associated with a first user in a plurality of users;	<p>"The search engine then identifies in any conceivable manner the articles which are associated with the matched key terms. This can be done by comparing all or part of the search query, or terms equivalent to those in the search query with the key terms in the index to identify the key terms which match the search query. The search engine may account for Boolean logic operators in the search query." Culliss at 4:12-15.</p>

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent’)	Disclosure in Culliss
	<p>“The search engine then compares the search query with the key terms from the articles and retrieves at least a portion of the articles having key terms which match the search query. The search engine will then display to the user the portion of the article such as the title. The user can then scroll through these retrieved portions of the articles and select a desired article.” Culliss at 1:44-47.</p> <p><i>See also</i> chart for claim 1(preamble), <i>supra</i>.</p>
<p>[b] a feedback system for receiving information found to be relevant to the query by other users; and</p>	<p>"As users enter search queries and select articles, the scores are altered. The scores are then used in subsequent searches to organize the articles that match a search query." Culliss at Abstract</p> <p>"Once the user has selected a matched article, and as shown in FIG. 1 at 40, the index can be altered such that the key term scores for the selected matched article under the matched key terms are altered relative to other key term scores." Culliss at 4:37-41.</p> <p>“If the user selected only article A3, the key term scores for selected matched article A3 under the matched key term groupings Alpha-Gamma would be altered. Additionally, the key term scores for selected matched article A3 under the matched key term groupings Alpha-Alpha and Gamma-Gamma could also be altered since the key terms Alpha and Gamma are each represented individually in the results of the search query.” Culliss at 7:60-67.</p>

**Claim language of U.S. Patent No. 6,775,664  
("the '664 Patent")**

**Disclosure in Culliss**

<u>Index</u>				
Alpha	Beta	Gamma	Delta	Epsilon
A1 - 1	A1 - 1	A1 - 1	A2 - 1	A1 - 1
A2 - 1		A3 - 1	A3 - 1	A3 - 1
A3 - 1				

“Thus, after executing the search query "Alpha AND Gamma," the search engine would display the squib of matched articles A1 and A3. If the user selected only article A3, the index could be altered such that the key term scores for the selected matched article A3 under the matched key terms Alpha and Gamma are altered relative to the other key term scores. The index would then look like this:” Cullis at 4:50-56.

<u>Index</u>				
Alpha	Beta	Gamma	Delta	Epsilon
A1 - 1	A1 - 1	A1 - 1	A2 - 1	A1 - 1
A2 - 1		A3 - 2	A3 - 1	A3 - 1
A3 - 2				

“Further, the key term total scores for both article A1 and article A3 under the matched key terms could also be altered. If the positive score is added to the key term scores for the selected matched article A3 under the matched key terms Alpha and Gamma, and the positive score is added to the key term total scores for the matched articles A1 and A3 (regardless of whether they were selected or not) under the matched key terms, the index would then look like this:” Cullis at 5:49-54.

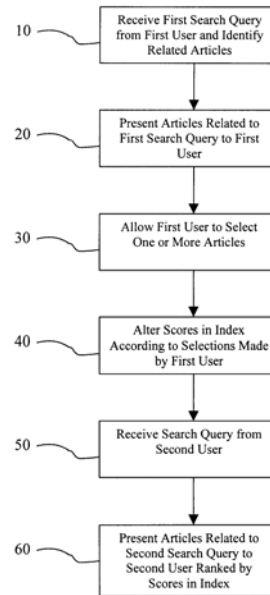
Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent”)	Disclosure in Culliss
	<p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:</p> <p>Herz at 6:13-18, 10:44-47, 19:9-14; 23:45-24:13.</p> <p>Lashkari at 59-60, 18.</p> <p>Tapestry at 63.</p> <p>GroupLens at 1, 2, 5-10.</p> <p>Rose at 6:59-7:10.</p> <p>Bowman at Abstract, claim 28[c], 2:32-34.</p> <p>Ryan at 2:31-37.</p>
<p>[c] a content-based filter system for combining the information from the feedback system with the information from the scanning system and for filtering the combined information for relevance to at least one of the query and the first user.</p>	<p>Culliss at 14:34-36 (disclosing that a key term score for a search result may be initially determined by the content of the search result – namely, how many times the key term appears in the search result’s content.)</p> <p>Culliss at 13:35-42 (“the comparison scores could be continuously combined with the ranking provided by the search engine to supplement or correct such a ranking. For example, the search engine may rank or organize the articles by providing a relevancy score, such as the percentile relevancy provided by the search engines ‘Excite’™ or ‘Lycos’™.</p> <p>"To this end, the key term scores of each matched article under each of the matched key terms of the new search could then be associated in any possible</p>

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent”)	Disclosure in Culliss
	<p>manner to create a comparison score for each matched article. For example, the key term scores could be added, multiplied together or averaged to create the comparison score for that matched article." Culliss at 5:1-5.</p> <p>“For the next search by either the same or a different user, the invention could then rank the matched articles by using the key term scores, as shown in FIG. 1 at 50 and 60. To this end, the key term scores of each matched article under each of the matched key terms of the new search could then be associated in any possible manner to create a comparison score for each matched article.” Culliss at 4:65-5:3.</p>



**Claim language of U.S. Patent No. 6,775,664  
("the '664 Patent")**

**Disclosure in Culliss**



**FIGURE 1**

To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:

Herz at 18:39-43.

Lashkari at 15-16, 60.

Tapestry at 61, 63.

Balabanovic at 69, 66.

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent’)	Disclosure in Culliss
	<p>GroupLens at 2, 3.</p> <p>Rose at Abstract, 6:5-11</p> <p>Bowman at 9:28-53; claim 29.</p> <p>Ryan at 1:59-66, 23:38-49.</p>
<p><b>5.</b> The search system of claim <b>1</b> wherein the filtered information is an advertisement.</p>	<p>"For example, the user may enter the category key terms "Apartments" and "Los Angeles" or the category key terms "Romantic" and "Comedy" to find articles (i.e. advertisements or movies) which fall under two or more category key terms." Culliss at 9:58-62.</p> <p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. <i>See, e.g.:</i></p> <p>Herz at 61:4-18.</p> <p>Bowman at 5:4, 9:2-3, claim 7.</p> <p>Ryan at 4:57-59, 22:49-55.</p>
<p><b>6.</b> The search system of claim <b>1</b> further comprising an information delivery system for delivering the filtered information to the first user.</p>	<p>Culliss at 4:25-31 (“As shown in FIG. 1 at <b>20</b>, the search engine will then display a squib of each of the matched articles . . . the user can then scroll through the squibs of the articles and select a desired one”)</p> <p>"The matched articles can then be displayed to the user in order of comparison score superiority, such as by displaying the matched article with the highest comparison score first." Culliss at 5:7-10.</p>

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent”)	Disclosure in Culliss
	<p>“The invention could then display the article A3 to the user in a superior position to article A1 because the comparison score for matched article A3 is higher.” Culliss at 6:42-45.</p> <p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:</p> <p>Herz at 6:13-18, Fig. 10 at 1106.</p> <p>GroupLens at 10, 11.</p> <p>Rose at Abstract.</p> <p>Bowman at 9:56-58.</p> <p>Ryan at 21:14-26, 23:47-49.</p>
<p><b>21.</b> The search system of claim 1 wherein the content-based filter system filters by extracting features from the information.</p>	<p>Culliss at 14:34-36 (disclosing that Culliss extracts words from the content of each search result in order to determine how often the words from the query are found in these search results.)</p> <p>"The articles are each associated with one or more of these key terms by any conceivable method of association, such as through indexing all words or through meta-tag headers containing key words selected by the author or editor." Cullis at 3:61:63.</p> <p>“The squib may comprise any portion, hypertext link to or representation of the matched article, such as the title, headings, first few lines of text, audio, video or any other type of information.” Cullis at 14:47-50.</p>

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent”)	Disclosure in Culliss
	<p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:</p> <p>Herz at 6:18-29.</p> <p>Lashkari at 15-16, 60.</p> <p>Tapestry at 67.</p> <p>Balabanovic at 69.</p> <p>GroupLens at 3.</p> <p>Rose at 2:35-38; 6:10-25.</p> <p>Bowman at 9:50-53; claim 29.</p> <p>Ryan at 16:4-9.</p>
<p><b>22.</b> The search system of claim <b>21</b> wherein the extracted features comprise content data indicative of the relevance to the at least one of the query and the user.</p>	<p><i>See</i> chart for Claim 21, <i>supra</i>.</p>
<p><b>26.</b> A method for obtaining information relevant to a first user comprising:</p>	<p><i>See</i> chart for Claim 1.</p>
<p>searching for information relevant to a query associated with a first user in a plurality of users;</p>	<p><i>See</i> chart for Claim 1(a)</p>
<p>receiving information found to be relevant to the</p>	<p><i>See</i> chart for Claim 1(b).</p>

Claim language of U.S. Patent No. 6,775,664 (“the ‘664 Patent”)	Disclosure in Culliss
query by other users;	
combining the information found to be relevant to the query by other users with the searched information; and	<i>See</i> chart for Claim 1(b).
content-based filtering the combined information for relevance to at least one of the query and the first user.	<i>See</i> chart for Claim 1(c).
<b>28.</b> The method of claim 26 further comprising the step of delivering the filtered information to the first user.	<i>See</i> chart for Claim 6, <i>supra</i> .
<b>38.</b> The method of claim 26 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.	<i>See</i> chart for Claim 1(a), <i>supra</i> .

Claim language of U.S. Patent No. 6,314,420 (“the ‘420 Patent”)	Disclosure in Culliss patent Reference
<b>10.</b> [preamble] A search engine system comprising:	<i>See chart for ‘664 Patent, Claim 1(a), supra.</i>
[a] a system for scanning a network to make a demand search for informons relevant to a query from an individual user;	<i>See chart for ‘664 Patent, Claim 1(a), supra.</i>
[b] a content-based filter system for receiving the informons from the scanning system and for filtering the informons on the basis of applicable content profile data for relevance to the query; and	<i>See chart for ‘664 Patent, Claim 1(c), supra.</i>
[c] a feedback system for receiving collaborative feedback data from system users relative to informons considered by such users;	<i>See chart for ‘664 Patent, Claim 1(b), supra.</i>
[d] the filter system combining pertaining feedback data from the feedback system with the content profile data in filtering each informon for relevance to the query.	<i>See chart for ‘664 Patent, Claim 1(c), supra.</i>
<b>14.</b> The system of claim <b>10</b> wherein the collaborative feedback data comprises passive feedback data.	<p>Culliss at Abstract (“As users enter search queries and select articles, the scores are altered”)</p> <p>Culliss at 4:32-34 (disclosing that Culliss passively monitors whether the user performs such selection actions as “opening, retrieving, reading, viewing, listening to or otherwise closely inspecting the article.”)</p> <p>"Once the user has selected a matched article, and as shown in FIG. 1 at 40, the index can be altered such that the key term scores for the selected matched article under the matched key terms are altered relative to other key term scores." Culliss at 4:37-41.</p>

Claim language of U.S. Patent No. 6,314,420 (“the ‘420 Patent”)	Disclosure in Culliss patent Reference
	<p>“For example, if the user selected only article A3 after executing a search query containing the rating key term X-Rated, the key term score for article A3 under the rating key term X-Rated would be altered relative to the other rating key term scores.” Culliss at 11:45-53.</p> <p>To the extent this reference does not teach this claim element, this reference in combination with the knowledge of one of ordinary skill in the art renders this claim element obvious. See, e.g.:</p> <p>Herz at 10:44-47.</p> <p>Tapestry at 62.</p> <p>GroupLens at 6, 10.</p> <p>Bowman at 2:31-35; 7:31-33; 9:2-3.</p> <p>Ryan at 9:22-30, 9:41-48.</p>
<p><b>15.</b> The system of claim <b>14</b> wherein the passive feedback data is obtained by passively monitoring the actual response to a proposed informon.</p>	<p>See chart for Claim 14, <i>supra</i>.</p>
<p><b>25.</b> A method for operating a search engine system comprising:</p>	<p>See chart for Claim 10(a).</p>
<p>scanning a network to make a demand search for informons relevant to a query from an individual user;</p>	<p>See chart for Claim 10(a).</p>
<p>receiving the informons in a content-based filter</p>	<p>See chart for Claim 10(b).</p>

Claim language of U.S. Patent No. 6,314,420 (“the ‘420 Patent’)	Disclosure in Culliss patent Reference
system from the scanning system and filtering the informons on the basis of applicable content profile data for relevance to the query;	
receiving collaborative feedback data from system users relative to informons considered by such users; and	<i>See</i> chart for Claim 10(c).
combining pertaining feedback data with the content profile data in filtering each informon for relevance to the query.	<i>See</i> chart for Claim 10(d).
<b>27.</b> The method of claim <b>25</b> wherein the collaborative feedback data provides passive feedback data.	<i>See</i> chart for Claim 14.
<b>28.</b> The method of claim <b>27</b> wherein the passive feedback data is obtained by passively monitoring the actual response to a proposed informon.	<i>See</i> chart for Claim 15.