

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSINHYPERPHRASE TECHNOLOGIES, LLC and
HYPERPHRASE INC.,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 06 C 0199 S

SECOND DECLARATION OF W. BRUCE CROFT, PH.D

I, W. Bruce Croft, am an expert retained by Defendant Google Inc. in connection with the above captioned matter. I submit this declaration in connection with Google's Motion for Summary Judgment of Invalidity.

1. **Exhibit 1** is a true and accurate copy of the body of my supplemental expert report in this matter, dated February 11, 2008, demonstrating invalidity of all remaining asserted claims. All opinions, views and conclusions expressed in this report are mine, and I adopt them for purposes of this motion.

2. A true and accurate copy of selected claim charts from my supplemental expert report in this matter are attached. All opinions, views and conclusions expressed in these claim charts are mine, and I adopt them for purposes of this motion:

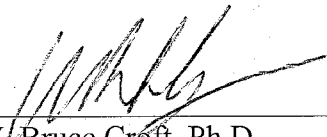
(a) **Exhibit 2(a)** is a true and accurate copy of an invalidity claim chart from my supplemental expert report for U.S. Patent No. 5,742,768 to Gennaro et al., entitled *System and Method For Providing and Displaying A Web Page Having an Embedded Menu* (filed Jul. 16, 1996).

- (b) **Exhibit 2(b)** is a true and accurate copy of a supplemental invalidity claim chart from my supplemental expert report for Graham, Ian S., *HTML Sourcebook: A Complete Guide to HTML*, pp. 167-68 (John Wiley & Sons. Eds., Mar. 1995), ISBN: 0-471-11849-4.
- (c) **Exhibit 2(c)** is a true and accurate copy of a supplemental invalidity claim chart from my supplemental expert report for Myka, A. & Guntzer, U. *Automatic Hypertext Conversion of Paper Document Collections*, in Selected Papers From the Digital Libraries Workshop on Digital Libraries: Current Issues, Lecture Notes In Computer Science, Vol. 916. Springer-Verlag, London. pp. 65-90 (N. R. Adam et al. eds.: Springer-Verlag, London) (May 19-20, 1994).
- (d) **Exhibit 2(d)** is a true and accurate copy of a supplemental invalidity claim chart from my supplemental expert report for Thistlewaite, Paul, *Automatic Construction and Management of Large Open Webs*, Info. Proc. & Mgmt., Vol. 33, No. 2, pp. 161-73 (Mar. 1997).
- (e) **Exhibit 2(e)** is a true and accurate copy of an invalidity claim chart from my supplemental expert report for the web pages from http://cs.nyu.edu/faculty/grishman/NETask20.book_3.html#HEADING4 illustrating the *MUC-6 Named Entity Task Definition*, (Version 2.0, 31 May 95), for the Proc. of the 6th Message Understanding Conf. (MUC-6), Columbia, Maryland, held on Nov. 6-8 1995. Posted on June 2, 1995 and printed on February 27, 2008.
- (f) **Exhibit 2(f)** is a true and accurate copy of an invalidity claim chart from my supplemental expert report for Aberdeen, J. et. al., *MITRE: Description of the*

Alembic System Used for MUC-6, Proc. of the 6th Conf. on Message
Understanding, pp. 141-155, Columbia, Maryland (Nov. 6-8 1995).

I declare under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct.

Dated: February 29, 2008



W. Bruce Croft, Ph.D