

EXHIBIT A

Appendix For Claim Chart Of '842 Claim 29 By Arelle/EDGARLink Online/EDGAR

In response to the Government’s letter of January 29, 2021 and in an effort to be cooperative above and beyond the requirements of the Patent Rules of the Court of Federal Claims, e-Numerate has set forth the below screenshots demonstrating infringement of Claim 29 of the '842 patent. These contentions are preliminary only and based on e-Numerate’s present understanding. Discovery is ongoing and e-Numerate reserves the right to supplement and amend these contentions as discovery proceedings.

The XBRL standard itself emphasizes the **three** validation points (datatypes, calculations, and units) specified in claim 29 of the '842 patent. That standard is shown below.

Figure 1. Validation documentation page for the XBRL standard at <https://specifications.xbrl.org/validation.html>

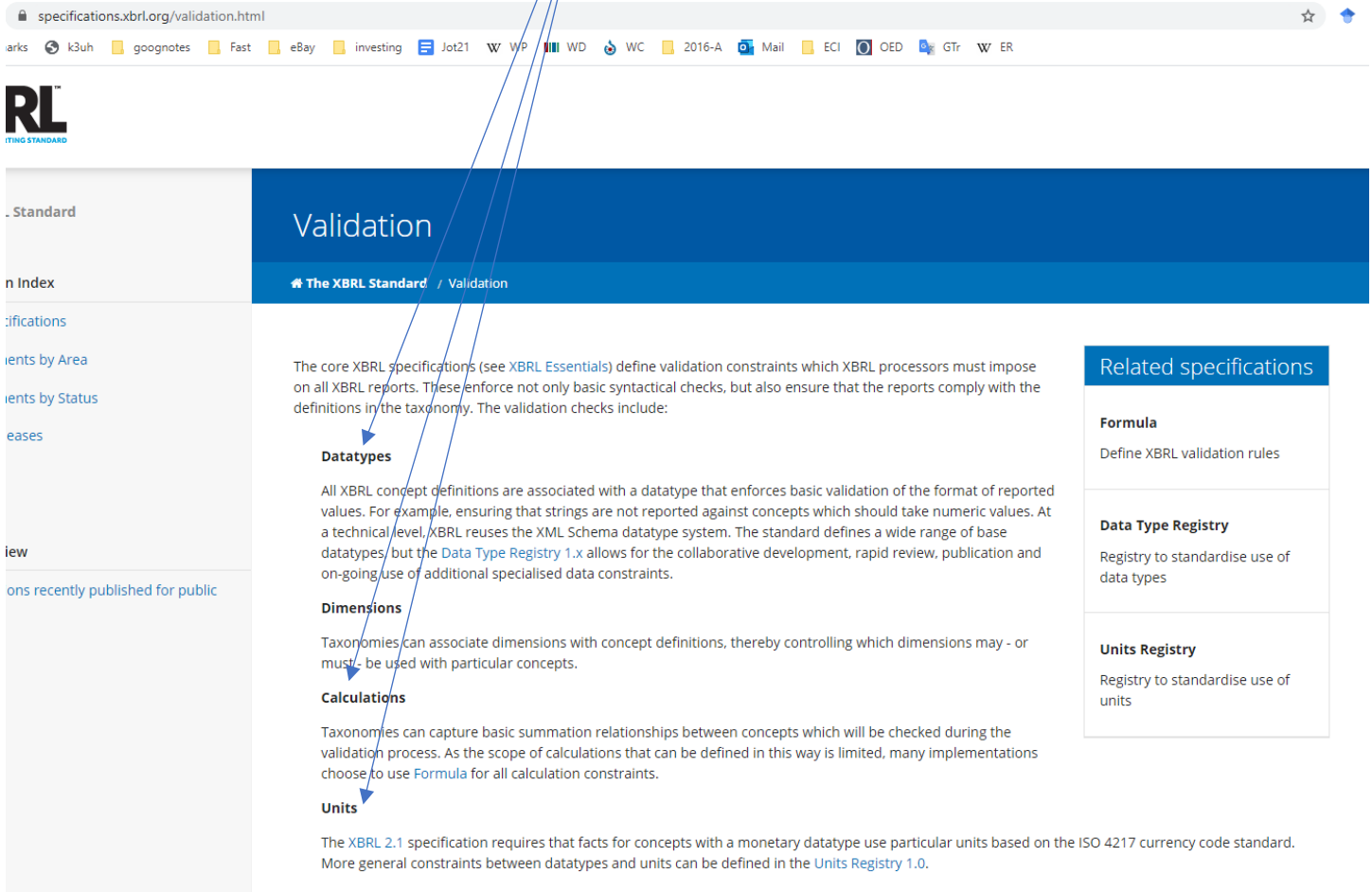


Figure 2. Arelle.org's Documentation Page

The Government has not explicitly stated that the source code found in Arelle is identical to the source code run in EDGARLink Online. The Government appears to refer to the validation functionality as the "EDGAR Filer Manual (EFM) validation plug-in that implements all validations documents in EDGAR Filer Manual sections 5.2.5. and section 6" as referenced the Government's letter of January 29, 2021 at page 4.

The Arelle.org Documentation Page describes the validations that it runs.

See <https://arelle.org/arelle/documentation/gui-operation/>

Note that the validation checks that are run include:

- a) Datatype
- b) Units
- c) Calculation rules

standard taxonomies to be loaded). There are two US SEC entries, one for Edgar Filer Manual rule checking, and the other for Global Filing Manual rule checking.

Note that the following validations are currently available:

- Versioning report features of CR-Base, CR-Concept Basic, and CR-Concept Extended
- Base spec XBRL 2.1 tests
 - Calculation tests either inferring precision or decimals
- XBRL Dimensions tests
- Disclosure systems:
 - SEC EFM features tested by the SEC EFM test suite (no others yet)
 - ITA GFM
 - Users can update the lib/disclosuresystems.xml file
- Unit Type Registry tests
- Formula: Formula output instance, consistency assertions, existence assertions, value assertions, sequence partitioning, fallback values processing, and commonly used filters and functions are complete. Extension modules are complete, including validation messages, multi-instance, chaining, aspect-cover and concept-relation filters. (Less common filters and functions will be added as users need them and otherwise as time permits.)

The presence of the elements in the claims is demonstrated in a non-limiting manner by a sample XBRL filing document. In the screenshots below, the document employed is an IBM 10-Q filing for 9/30/2013.

Sample XBRL filing document: IBM 10-Q for 9/30/2013

<https://www.sec.gov/Archives/edgar/data/51143/000005114313000007/ibm-20130930.xml>

The following figures illustrate the IBM 10-Q in different formats.

Figure 3. What the IBM 10-Q looks like in the raw XML / XBRL file

0000051143 2013-01-01 2013-09-30 0000051143 2013-09-30 0000051143 2013-07-01 2013-09-30 0000051143 2012-07-01
 2012-01-01 2012-09-30 0000051143 2012-12-31 0000051143 2012-09-30 0000051143 2011-12-31 0000051143 us-
 gaap:CommonStockIncludingAdditionalPaidInCapitalMember 2012-01-01 2012-09-30 0000051143 us-
 gaap:CommonStockIncludingAdditionalPaidInCapitalMember 2011-12-31 0000051143 us-
 gaap:CommonStockIncludingAdditionalPaidInCapitalMember 2012-09-30 0000051143 us-gaap:RetainedEarningsMember 2
 0000051143 us-gaap:RetainedEarningsMember 2012-09-30 0000051143 us-gaap:RetainedEarningsMember 2011-12-31 0000
 gaap:TreasuryStockMember 2012-01-01 2012-09-30 0000051143 us-gaap:TreasuryStockMember 2011-12-31 0000051143 us
 gaap:TreasuryStockMember 2012-09-30 0000051143 us-gaap:AccumulatedOtherComprehensiveIncomeMember 2011-12-31
 gaap:AccumulatedOtherComprehensiveIncomeMember 2012-01-01 2012-09-30 0000051143 us-
 gaap:AccumulatedOtherComprehensiveIncomeMember 2012-09-30 0000051143 us-gaap:ParentMember 2012-09-30 000005
 gaap:ParentMember 2011-12-31 0000051143 us-gaap:ParentMember 2012-01-01 2012-09-30 0000051143 us-gaap:Noncontr
 2012-01-01 2012-09-30 0000051143 us-gaap:NoncontrollingInterestMember 2011-12-31 0000051143 us-gaap:Noncontrollin
 09-30 0000051143 us-gaap:NoncontrollingInterestMember 2012-12-31 0000051143 us-gaap:NoncontrollingInterestMember
 0000051143 us-gaap:NoncontrollingInterestMember 2013-09-30 0000051143 us-gaap:ParentMember 2012-12-31 000005114
 2013-01-01 2013-09-30 0000051143 us-gaap:ParentMember 2013-09-30 0000051143 us-gaap:AccumulatedOtherCompreher
 2012-12-31 0000051143 us-gaap:AccumulatedOtherComprehensiveIncomeMember 2013-01-01 2013-09-30 0000051143 us-
 gaap:AccumulatedOtherComprehensiveIncomeMember 2013-09-30 0000051143 us-gaap:TreasuryStockMember 2013-01-01
 us-gaap:TreasuryStockMember 2013-09-30 0000051143 us-gaap:TreasuryStockMember 2012-12-31 0000051143 us-gaap:Re

Figure 4. The same IBM 10-Q in the Chrome Browser "Source Code" view

The IBM 10-Q is an XML-compliant document that contains tagged numerical values. An example of a tagged number is shown in line 8944. This number represents "SalesRevenueGoodsNet" from the us-gaap taxonomy, and the highlighted value is 8947000000 with units of "USD". The tag is illustrated by the beginning and ending angle brackets below. The 'semantic meaning' of the number is indicated by the attributes within the tag. In this example, the data value (8987000000) has four attributes describing its meaning (e.g., `unitRef="USD"` is one of the attributes).

```

6937 <dei:CurrentFiscalYearEndDate id="ID_5" contextRef="FROM_Jan01_2013_TO_Sep30_2013_Enti
6938 31</dei:CurrentFiscalYearEndDate>
6939 <dei:EntityCurrentReportingStatus id="ID_6"
6940 contextRef="FROM_Jan01_2013_TO_Sep30_2013_Entity_0000051143">Yes</dei:EntityCurrentReportingStatus>
6941 <dei:EntityFilerCategory id="ID_7" contextRef="FROM_Jan01_2013_TO_Sep30_2013_Entity_0000051143">Large Accelerated
6942 Filer</dei:EntityFilerCategory>
6943 <dei:EntityCommonStockSharesOutstanding id="ID_8" contextRef="AS_OF_Sep30_2013_Entity_0000051143" unitRef="shares"
6944 decimals="INF">1085854383</dei:EntityCommonStockSharesOutstanding>
6945 <dei:DocumentFiscalYearFocus id="ID_9"
6946 contextRef="FROM_Jan01_2013_TO_Sep30_2013_Entity_0000051143">2013</dei:DocumentFiscalYearFocus>
6947 <dei:DocumentFiscalPeriodFocus id="ID_10"
6948 contextRef="FROM_Jan01_2013_TO_Sep30_2013_Entity_0000051143">Q3</dei:DocumentFiscalPeriodFocus>
6949 <us-gaap:SalesRevenueServicesNet id="ID_11" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6950 decimals="-6">14225000000</us-gaap:SalesRevenueServicesNet>
6951 <us-gaap:SalesRevenueGoodsNet id="ID_12" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6952 decimals="-6">8987000000</us-gaap:SalesRevenueGoodsNet>
6953 <us-gaap:FinancialServicesRevenue id="ID_13" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6954 decimals="-6">5090000000</us-gaap:FinancialServicesRevenue>
6955 <us-gaap:Revenues id="ID_14" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6956 decimals="-6">23720000000</us-gaap:Revenues>
6957 <us-gaap:CostOfServices id="ID_15" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6958 decimals="-6">9098000000</us-gaap:CostOfServices>
6959 <us-gaap:CostOfGoodsSold id="ID_16" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6960 decimals="-6">29750000000</us-gaap:CostOfGoodsSold>
6961 <us-gaap:FinancialServicesCosts id="ID_17" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6962 decimals="-6">268000000</us-gaap:FinancialServicesCosts>
6963 <us-gaap:CostOfRevenue id="ID_18" contextRef="FROM_Jul01_2013_TO_Sep30_2013_Entity_0000051143" unitRef="USD"
6964 decimals="-6">12341000000</us-gaap:CostOfRevenue>

```

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