

Patent No. 6,918,082  
Petition For Covered Business Method Patent Review

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Intralinks, Inc.  
Petitioner

v.

Lone Star Document Management, LLC  
Patent Owner

Patent No. 6,918,082  
Issue Date: July 12, 2005  
Title: ELECTRONIC DOCUMENT PROOFING SYSTEM

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Covered Business Method Review No. \_\_\_\_\_

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**DECLARATION OF STEPHEN WINSLOW  
IN SUPPORT OF PETITIONER INTRALINKS**

I, Stephen Winslow, make this declaration in connection with the proceeding identified above.

1. I am the Vice President, Technology Law at Intralinks, Inc. (“Intralinks”).

2. Attached as Appendix A to my declaration is a true and correct copy of a letter received by Intralinks from Devlin Law Firm LLC (“Devlin”) on behalf of Lone Star Document Management, LLC (“Lone Star”) dated June 24, 2015.

3. Attached as Appendix B to my declaration is a true and correct copy of a letter sent by Intralinks to Devlin on July 24, 2015.


4. Attached as Appendix C to my declaration is a true and correct copy of a letter sent by Devlin, on behalf of Lone Star, to Intralinks on August 26, 2015.

5. Attached as Appendix D to my declaration is a true and correct copy of a printout from Intralinks’s webpage.

6. As stated on Intralinks’s website attached as Appendix D, Intralinks’s software and services are used by more than 75% of the 25 largest U.S. and European banks and securities firms. Intralinks’s software and services include the Intralinks VIA platform, with software capabilities such as file synchronization, file sharing and content collaboration.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code.

Dated: October 12, 2015

  
Stephen Winslow

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**DEVLIN LAW FIRM LLC**

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1306 N. Broom Street, 1<sup>st</sup> Floor  
Wilmington, Delaware 19806  
United States of America

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June 24, 2015

**VIA FEDERAL EXPRESS**

Scott Semel, General Counsel  
IntraLinks, Inc.  
150 East 42<sup>nd</sup> Street, 8<sup>th</sup> Floor  
New York, NY 10017

Re: Infringement of Lone Star Document Management, LLC's U.S. Patent  
No. 6,918,082

Dear Mr. Semel:

I am writing on behalf of our client Lone Star Document Management, LLC ("Lone Star"). Lone Star is the assignee of all right, title, and interest in U.S. Patent No. 6,918,082 entitled "Electronic Document Proofing System" (the "'082 patent"). The '082 patent generally relates to proofing electronic documents delivered over a network.

Based on our review of publicly available information, Lone Star has learned that IntraLinks, Inc. and its affiliates ("IntraLinks") are infringing one or more claims of the '082 patent through the use, manufacture, sale, and offers for sale of its enterprise collaboration system (the "Infringing Products"). The Infringing Products of the '082 patent include but are not limited to the IntraLinks Platform products and services.

Based on our investigation, it appears that the provision, use, sale, and/or offer for sale of the Infringing Products directly infringes one or more claims of the '082 patent by virtue of a combination of features. For example, claim 10 of the '082 patent teaches a system for proofing portable format electronic documents delivered over a network through the use of a computer, software running on said computer, proofer identifiers to prevent unauthorized access to content, and the ability to manage and simultaneously display electronic documents and comments. The Infringing Products provide comprehensive capabilities for managing and processing documents in a way that directly infringes claim 10.

Of course, infringement of any patent is determined according to the claims of the patent. While our investigation is ongoing, we have enclosed a preliminary infringement analysis which we believe demonstrates the infringing nature of IntraLinks' products and services. It is important to note that this analysis is preliminary in nature, based only on publicly available information regarding IntraLinks' products and services. Lone Star

**DEVLIN LAW FIRM**

June 24, 2015

Page 2 of 2

reserves all rights to amend or supplement the enclosed analysis, or to assert additional patents as our investigation continues.

We also believe that IntraLinks is inducing infringement of the '082 patent by actively aiding and abetting others to use the Infringing Products. Specifically, IntraLinks actively induces these other entities to engage in these actions by advertising, offering for sale, and selling the Infringing Products, and by providing user manuals, product documentation, and other instructions regarding the use of the claimed features of the '082 patent in the Infringing Products.

Further, we believe that IntraLinks is contributing to infringement of the '082 patent by providing the Infringing Products to others, including its partners, customers, and end users; because the Infringing Products constitute a material part of the invention, were especially made or especially adapted for use in an infringement of the patent, and have no substantial non-infringing uses.

As a result of IntraLinks' infringement of the '082 patent, Lone Star has suffered damages and will continue to suffer damages in the future. Lone Star is nevertheless hopeful that the parties can engage in discussions to reach an amicable resolution of this matter. Accordingly, please contact me at your earliest convenience to discuss an appropriate resolution of your company's past and ongoing infringement of the '082 patent. I can be reached by phone at (302) 449-9010 or by email at [correspondence@devlinlawfirm.com](mailto:correspondence@devlinlawfirm.com).

Thank you in advance for your attention to this important matter.

Very truly yours,



Timothy Devlin

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**Preliminary Analysis of Infringement of U.S. Patent No. 6,918,082 by IntraLinks Holdings, Inc. (“IntraLinks”) by IntraLinks’ Software and Services (Based on Public Information Only)**

Lone Star Document Management Systems LLC (“Lone Star”) provides this preliminary and exemplary infringement analysis with respect to IntraLinks’ infringement of U.S. Patent No. 6,918,082 entitled “Electronic Document Proofing System.” The following chart illustrates an exemplary analysis of the document collaboration products and services offered by IntraLinks (the “Infringing Instrumentalities”). The analysis is based only upon information gleaned from publically available resources regarding the Infringing Instrumentalities, as IntraLinks has not yet provided any non-public information or source code. IntraLinks directly infringes the ’082 Patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing of the Infringing Instrumentalities which embody the claimed features of the patented systems. The following exemplary analysis demonstrate that IntraLinks directly infringes the ’082 Patent.

Unless otherwise noted, Lone Star believes and contends that each element of each claim asserted herein is literally met through IntraLinks’ provision of the Infringing Instrumentalities. However, to the extent that IntraLinks attempts to allege that any asserted claim element is not literally met, Lone Star believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Infringing Instrumentalities sold, offered for sale, made, used, and/or imported by IntraLinks, Lone Star did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Infringing Instrumentalities, as set forth herein. In each instance, the identified feature of the Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

Lone Star notes that the present claim chart and analysis are necessarily preliminary for reasons including that there is no pending litigation between Lone Star and IntraLinks and therefore Lone Star has not obtained discovery from IntraLinks nor has IntraLinks disclosed any detailed analysis for its non-infringement position. Further, because no litigation is currently pending, Lone Star does not have the benefit of claim construction or expert discovery. Lone Star hereby specifically reserves the right to supplement and/or amend the positions taken in this preliminary and exemplary infringement analysis, including with respect to literal infringement and infringement under the doctrine of equivalents, if and when warranted by further information obtained by Lone Star prior to or during the pendency of any subsequent litigation, including information adduced through fact discovery, claim construction, expert discovery, and/or further analysis.

| Claim Element  | Evidence   |
|--|--|
| <b>Claim 10</b>  |  |
| A system for proofing electronic documents delivered over a network , comprising:                        | <p>IntraLinks' VIA platform comprises a system for proofing electronic documents delivered over a network.</p> <p><u>Intralinks VIA allows content collaboration through the creation of workspaces, enabling business professionals to work together on a document or project. Further, Intralinks VIA, which is accessible through a simple web-based user interface, allows users to access and share files at any time from their desktops to their mobile devices, while security and IRM capabilities ensure constant control and monitoring over the content. Intralinks VIA integrates with existing applications and systems, providing an extension of familiar tools and experiences, and the means to coordinate work across people, organizations and devices.</u></p> <p><b>IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 6</b></p> |
| a database of portable format electronic documents stored together with at least one proofer identifier; | <p>IntraLinks' VIA platform comprise a database of portable format electronic documents.</p> <p>IntraLinks comprises a database of portable format electronic documents. IntraLinks stores files, including those in portable document file format, in a centralized pool known as VIA Drive.</p>  |

Intralinks VIA Drive

Copy to New Work Stream Rename Delete New Folder Upload

| NAME  | MODIFIED DATE         | SIZE   |
|---|-----------------------|--------|
| Research  | 08/4/2014 at 8:52 am  | -      |
| Lobbying  | 08/4/2014 at 8:51 am  | -      |
| Arbitrations  | 08/4/2014 at 8:51 am  | -      |
| Manufacturer's Failure To Warn Consumer of Allergenic Nature of Product.doc | 08/3/2014 at 9:43 pm  | 990 KB |
| <b>Kendall v VI Daily News.pdf</b>  | 08/3/2014 at 9:41 pm  | 220 KB |
| <b>Commonwealth v Fujita.pdf</b>  | 08/3/2014 at 9:40 pm  | 203 KB |
| <b>The Evolution of Electronic Discovery.pdf</b>                            | 08/3/2014 at 9:40 pm  | 77 KB  |
| <b>Stone-Ashe-v-DEP.pdf</b>   | 07/20/2014 at 9:16 pm | 41 KB  |

Live Support

<http://www.lawsitesblog.com/wp-content/uploads/2014/08/IntraLinksDrive.jpg>

The term “proofer” as used in the ’082 Patent refers to a user who is authorized to access and or view a document. Similarly, the term “proofer identifier” as used in the ’082 Patent refers to a means to endow the authority to access and/or view a document on some users while denying such access to others (one example being a password). (See, e.g., ’082 Patent at 3:60-4:14; see also 7:61-64 referring to usernames, passwords, and permissions for users of a preferred embodiment of the patented technology.) Intralinks enables the use of proofer identifiers to access stored portable format electronic documents.



|  |  |
|--|--|
|  | <p>Functionally, Intralinks VIA is like two separate applications in one platform:</p> <ul style="list-style-type: none"> <li>• <b>Intralinks VIA Drive</b> is for secure document storage in the cloud. It allows you to access your files from wherever you are, whether from your desktop, through a web browser or on a mobile device. The documents you store in Drive are accessible only to you, they cannot be shared with others directly. (They can be shared through Work Streams, as discussed below.)</li> <li>• <b>Intralinks VIA Work Streams</b> is a platform for file sharing and collaboration. This is where you create projects for sharing with others (called Work Streams), add documents to projects, track document comments and revisions, and <u>control permissions among collaborators.</u></li> </ul> <p><a href="http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html">http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html</a></p> <p>We have built a highly sophisticated authentication, authorization and encryption service designed to ensure that the content stored in our system is accessible only by authorized users. We employ a wide range of technical security features, including two factor authentication using RSA Adaptive Authentication and data encryption with encoded session identifiers and passwords. Every file we transmit from an exchange is encrypted in transit via Transport Layer Security, or TLS, up to v1.2. We also use encryption technology in our storage systems and backup tapes. <u>We incorporate sophisticated information rights management and permissioning controls that enable our customers to control the role of and access of participants to information.</u> Our platform also provides audit trails for compliance and access history tracking for content throughout its lifecycle.</p> <p><b>IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 9</b></p> |
| <p>a computer connectable to the network for receiving a plurality of comments, each concerning a particular one of the portable</p> | <p>Computers or servers running IntraLinks' VIA platform comprise a computer connectable to the network for receiving a plurality of comments, each concerning a particular one of the portable format documents.</p> <p>IntraLinks VIA is a software-as-a-service (SaaS) platform. IntraLinks' software operates on hardware in multiple data centers which are in communication over the internet.</p>   |

format documents;

We deliver our solutions through a cloud-based model, making them available on-demand over the Internet using a multi-tenant SaaS architecture in which a single instance of our software serves all of our customers. We sell our solutions directly through a field sales team with industry-specific expertise and an inside sales team, and indirectly through a customer referral network and channel partners. In 2014, we generated \$255.8 million in revenue, 42.8% of which was derived from sales across 94 countries outside of the U.S.

**IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 5**

The IntraLinks Platform is hosted in four secure data centers provided by SunGard Availability Services LP that are run in primary and secondary mode with redundancy and failover capability. Physical security at these facilities includes a continually staffed security station along with biometric and man trap access controls. Systems are protected by firewalls and encryption technology. Each data center features redundant power, on-site backup generators, and environmental controls and monitoring. As part of our disaster recovery arrangements, all customer data is replicated to all sites in near real-time. Our hosting providers conduct regular security audits of our infrastructure and we also employ outside vendors for managed security and monitoring 24 hours per day, 7 days per week, 365 days per year. The performance of our application suite is continually monitored using a variety of automated tools and customer data is regularly backed up and stored in a primary and secondary secure location to minimize the risk of data loss at any facility.

**IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 9**

The IntraLinks platform enables the computer to receive comments pertaining to particular portable format documents.

Revisions to files are tracked with version numbers and all previous versions are retained. Participants can add comments to documents. Others in the Work Stream are notified of all new activity, including comments and file uploads.

<http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html>

|   |  |
|---|--|
|   | <p>Functionally, Intralinks VIA is like two separate applications in one platform:</p> <ul style="list-style-type: none"> <li>• <b>Intralinks VIA Drive</b> is for secure document storage in the cloud. It allows you to access your files from wherever you are, whether from your desktop, through a web browser or on a mobile device. The documents you store in Drive are accessible only to you, they cannot be shared with others directly. (They can be shared through Work Streams, as discussed below.)</li> <li>• <b>Intralinks VIA Work Streams</b> is a platform for file sharing and collaboration. This is where you create projects for sharing with others (called Work Streams), add documents to projects, <u>track document comments</u> and revisions, and control permissions among collaborators.</li> </ul> <p><a href="http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html">http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html</a></p>  |
| <p>a program executing on said computer for associating and storing the received plurality of comments together with the particular portable format electronic documents;</p> | <p>IntraLinks' VIA platform comprises a program executing on said computer for associating and storing the received plurality of comments together with the particular portable format electronic documents.</p> <p>IntraLinks VIA SaaS operates on hardware in multiple data centers which are in communication over the internet.</p> <p><u>We deliver our solutions through a cloud-based model, making them available on-demand over the Internet using a multi-tenant SaaS architecture in which a single instance of our software serves all of our customers.</u> We sell our solutions directly through a field sales team with industry-specific expertise and an inside sales team, and indirectly through a customer referral network and channel partners. In 2014, we generated \$255.8 million in revenue, 42.8% of which was derived from sales across 94 countries outside of the U.S.</p> <p><b>IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 5</b></p> <p><u>The Intralinks Platform is hosted in four secure data centers</u> provided by SunGard Availability Services LP that are run in primary and secondary mode with redundancy and failover capability. Physical security at these facilities includes a continually staffed security station along with biometric and man trap access controls. Systems are protected by firewalls and encryption technology. Each data center features redundant power, on-site backup generators, and environmental controls and monitoring. As part of our disaster recovery arrangements, <u>all customer data is replicated to all sites in near real-time.</u> Our hosting providers conduct regular security audits of our infrastructure and we also employ outside vendors for managed security and monitoring 24 hours per day, 7 days per week, 365 days per year. The performance of our application suite is continually monitored using a variety of automated tools and customer data is regularly backed up and stored in a primary and secondary secure location to minimize the risk of data loss at any facility.</p> |

**IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 9**

The computer hardware associates and stores the received plurality of comments together with the particular portable format electronic documents. The comments are associated and stored with the portable format electronic document.

Revisions to files are tracked with version numbers and all previous versions are retained. Participants can add comments to documents. Others in the Work Stream are notified of all new activity, including comments and file uploads.

<http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html>

Functionally, IntraLinks VIA is like two separate applications in one platform:

- **IntraLinks VIA Drive** is for secure document storage in the cloud. It allows you to access your files from wherever you are, whether from your desktop, through a web browser or on a mobile device. The documents you store in Drive are accessible only to you, they cannot be shared with others directly. (They can be shared through Work Streams, as discussed below.)
- **IntraLinks VIA Work Streams** is a platform for file sharing and collaboration. This is where you create projects for sharing with others (called Work Streams), add documents to projects, track document comments and revisions, and control permissions among collaborators.

<http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html>

said computer for receiving a request, from a proofer presenting the proofer identifier,

IntraLinks' VIA platform comprises a computer for receiving a request, from a proofer presenting the proofer identifier, to review a particular portable format electronic document.

The computer, as identified in the elements above and running IntraLinks software, receives and authenticates user's credentials (i.e. a proofer identifier) from a user requesting to review a particular portable format electronic document and further associates the activities of the individual user with the portable format electronic document requested.




|  |  |
|--|--|
| <p>to review a particular portable format electronic document;</p>   | <p>We have built a highly sophisticated authentication, authorization and encryption service designed to ensure that the content stored in our system is accessible only by authorized users. We employ a wide range of technical security features, including two factor authentication using RSA Adaptive Authentication and data encryption with encoded session identifiers and passwords. Every file we transmit from an exchange is encrypted in transit via Transport Layer Security, or TLS, up to v1.2. We also use encryption technology in our storage systems and backup tapes. <u>We incorporate sophisticated information rights management and permissioning controls that enable our customers to control the role of and access of participants to information.</u> Our platform also provides audit trails for compliance and access history tracking for content throughout its lifecycle.</p> <p><b>IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended December 31, 2014 p. 9</b></p> <p>Functionally, Intralinks VIA is like two separate applications in one platform:</p> <ul style="list-style-type: none"> <li>• <b>Intralinks VIA Drive</b> is for secure document storage in the cloud. It allows you to access your files from wherever you are, whether from your desktop, through a web browser or on a mobile device. The documents you store in Drive are accessible only to you, they cannot be shared with others directly. (They can be shared through Work Streams, as discussed below.)</li> <li>• <b>Intralinks VIA Work Streams</b> is a platform for file sharing and collaboration. This is where you create projects for sharing with others (called Work Streams), add documents to projects, track document comments and revisions, and <u>control permissions among collaborators.</u></li> </ul> <p><a href="http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html">http://www.lawsitesblog.com/2014/08/intralinks-via-emphasizes-security-file-sharing-collaboration.html</a></p> |
| <p>said program for retrieving and formatting the requested document together with the associated plurality of comments for simultaneous</p> | <p>IntraLinks' VIA platform comprises a program for retrieving and formatting the requested document together with the associated plurality of comments for simultaneous display to permit review.</p> <p>IntraLinks software running on a computer, as identified in the elements above, retrieves and formats requested documents together with comments and enables simultaneous display of comments and documents. On information and belief, documents, including portable format electronic documents can be opened in the native software associated for that file type. While simultaneously viewing a requested document in the native software associated for that file type, users of IntraLinks can view the plurality of comments associated with said document.</p>  |

display to permit review.

The screenshot displays a document viewer interface for a PDF file named "2015 Sales Plan - Prel...pdf". The document is identified as "Version 3", 519.05 KB, updated today at 12:25 am by Steve Olson. The interface includes a toolbar with icons for download, share, delete, and print, along with an "Upload New Version" button and a notification badge showing "0". A comment section is visible with a text input field labeled "Add Comment..." and a "COMMENT" button. A note states: "Note: Comments are sent by email. Include sensitive information with caution." The version history shows two entries: "Version 3 (Current)" by Steve Olson (moments ago) with the comment "Kim, please ask Li to verify the figures before sharing this information.", and "Version 2" by Steve Olson (yesterday at 10:05 pm) with the comment "The updated document includes projected revenue from new mobile apps."

**IntraLinks VIA for the Web Startup Guide p. 7**

Additionally, users of IntraLinks can view comments pertaining to particular portable format electronic documents simultaneously with the document when using the IntraLinks Viewer.

If you are viewing a PDF document with bookmarks, you can click the bookmarks icon  to display the document's bookmarks. If the PDF document includes documents, click the attachments icon  to display a list of attachments. Similarly, click the comments icon  to view any comments that have been added to the document. (These icons do not appear if the PDF document does not include these items.)

**IntraLinks Platform User Guide for DCM Managers and Publishers p. 107**



July 24, 2015

Devlin Law Firm LLC  
1306 N. Broom Street, 1st Floor  
Wilmington, DE 19806  
Attn: Robert Kiddie

VIA EMAIL AND OVERNIGHT DELIVERY

RE: Letter re: U.S. Patent No. 6,918,082

Dear Robert:

This is further to our conversation of July 10, 2015, in which we discussed the letter from Timothy Devlin of your firm, alleging that Intralinks infringes U.S. Patent 6,918,082.

In our conversation, I emphasized that I wanted to get a sense of the range of your licensing fees so that we might avoid further legal expense. You were unable to provide me with that information without first receiving confidential financial and technical information from Intralinks.

We are therefore responding to your infringement accusation.

One problem with your accusation arises out of the last limitation of claim 10 of the patent, which you charted with your letter. That claim requires “simultaneous display” of a “requested document together with the associated plurality of comments” to “permit review.”

As the screen shot you included from our “Web Startup Guide” illustrates, however, Intralinks VIA does not simultaneously display a requested document and the commenting functionality that is part of the Intralinks platform.

Your chart included an extract from our “Platform User Guide” that discusses comments stored by a document creator within a .pdf document. That suggests you are confusing the Intralinks VIA services with those inherent in the Adobe .pdf format, to which the extract is referring. Those services are, of course, quite distinct. We don’t think you mean to assert that we are infringing on account of Adobe’s document format, and of course such a claim would have no merit.

Another fundamental problem with your allegation is that the ’082 patent covers unpatentable subject matter. The Supreme Court has recently clarified what a patent can cover and what is too abstract to be patented. The courts and the Patent Office have consequentially invalidated many previously issued patents.





The '082 patent falls squarely within the "too abstract" category. Proofing documents and applying comments to them was undertaken long before computers assisted in that process. Your patent does no more than apply common computer techniques to that abstract idea, and hence does not meet the requirements for patentable subject matter.

For these and other reasons, we see little value in a license to the '082 patent.

Sincerely,

A handwritten signature in black ink that reads "Stephen Winslow".

Stephen Winslow  
Vice President, Technology Law

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## DEVLIN LAW FIRM LLC

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United States of America

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August 26, 2015

Stephen Winslow  
Vice President, Technology Law  
Intralinks, Inc.  
150 East 42<sup>nd</sup> Street, 8<sup>th</sup> Floor  
New York, NY 10017

Re: Infringement of Lone Star Document Management, LLC's U.S. Patent No.  
6,918,082

Dear Mr. Winslow:

We are in receipt of your correspondence dated July 24, 2015 in which you purport to rebut the presence of certain limitations of the '082 patent in the Intralinks platform. You assert that Intralinks VIA "does not simultaneously display a requested document and the commenting functionality that is part of the Intralinks platform." This assertion, however, is contradicted by Intralinks' own literature.

In Intralinks' most recent 10-K filing with the SEC, Intralinks states that a single instance of its software delivers all of its SaaS solutions to its clients via the Internet.

We deliver our solutions through a cloud-based model, making them available on-demand over the Internet using a multi-tenant SaaS architecture in which a single instance of our software serves all of our customers. We sell our solutions directly through a field sales team with industry-specific expertise and an inside sales team, and indirectly through a customer referral network and channel partners. In 2014, we generated \$255.8 million in revenue, 42.8% of which was derived from sales across 94 countries outside of the U.S.

**IntraLinks Holdings, Inc. Annual Report on Form 10-K For the year ended  
December 31, 2014 p. 5**

Given this language, our understanding is that each of the solutions provided by Intralinks, including the VIA, are underpinned by a common platform and possess the same capabilities including the capabilities pertaining to viewing stored documents. With respect to the Intralinks Viewer, Intralinks states, "Intralinks Viewer can be used to view PDF documents, Microsoft Excel spreadsheets and Microsoft Word documents. It provides an alternative for users who cannot install the tools needed to view documents to which printing and download restrictions have been applied. It is an alternative to Adobe Reader and similar tools." *See* IntraLinks Platform User Guide for DCM Managers and Publishers, p. 23. Through the Intralinks Viewer, even users without Adobe or other pdf reader software can view pdf documents to which comments have been made. As identified in our claim chart, users can view these comments simultaneously with the document they are viewing in the Intralinks Viewer. It is the Intralinks platform software that is enabling this.

Notwithstanding the above, the Intralinks Viewer is not required to be used to view documents.

Although you can require users to view documents in Intralinks Viewer, it is not necessary to do so. If you choose to enable Intralinks Viewer and make it optional for exchange users, it can serve as an alternative means for viewing documents — ensuring that all users can open the protected documents that they have been given permission to view.

**IntraLinks Platform User Guide for DCM Managers and Publishers, p. 93.**

In addition to the above functionality, the Intralinks platform enables users of Intralinks to also open documents in their native application.

Each of these file types can be enabled separately; you could choose to enable Intralinks Viewer only for Microsoft Word, for example. You can choose to make Intralinks Viewer available only for protected files, or for all PDFs and Microsoft Excel, Word and PowerPoint files on the exchange. You can choose to require that Intralinks Viewer be used by all viewers, or you can give exchange managers the option to view documents in their native application. For Microsoft Office documents, you can give users the option to view the documents in either Intralinks Viewer or Acrobat Reader.

**IntraLinks Platform User Guide for DCM Managers and Publishers, p. 93.**

Thus, our understanding is that users of the Intralinks platform can open a pdf file in whatever software viewer they have assigned to open pdf files, while at the same time, maintaining the separate browser window for the Intralinks platform which allows the user to view the comments associated with the document simultaneously with the document itself.

Additionally, the limitation of applying comments to documents and their subsequent simultaneous display with the document is not so narrow as to only be met in the above-referenced manner. The examples recited in this letter and in Lone Star's Preliminary Infringement Analysis are merely illustrative. Lone Star reserves the right to amend and/or supplement its position as its investigation continues.

We hope this letter helps you better understand Lone Star's position regarding Intralinks' infringement of the '082 patent. We remain hopeful that Lone Star and Intralinks can resolve this matter amicably and look forward to your response.

**DEVLIN LAW FIRM**

August 26, 2015

Page 3 of 3

Very truly yours,



Timothy Devlin

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INTRA  
LINKS

# Intralinks for Banking and Securities

Secure and controlled sharing of sensitive information with external parties

Banking and Securities firms face intense pressure to accelerate business velocity, while maintaining compliance with a web of complex regulations. Controlled sharing of information is at the heart of most financial activities – but also the basis of rapidly expanding regulatory risk.

[Talk to an Expert](#)

First Name \*

Last Name \*

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Company \*

Title

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**Submit**

Used by more than 75% of the  
25 largest US and European  
banks and securities firms

# Needs We Support

Secure and controlled content management, distribution and collaboration for high-risk and regulated business information, including:

**Exam Management & Regulatory Reporting:** Increase regulatory responsiveness, reduce submission error risk, and improve process efficiency

- [Managing Regulatory Examinations](#)
- [Managing Regulatory Filings](#)

**Managing Vendors and Third Parties:** Secure shared data, enforce service level agreements, and build regulator confidence

- [Vendor Risk Management](#)

**Investigations and Litigation Support:** Speed time to resolution, build regulator confidence, and control internal/external access to high-risk information

- [Financial Institution Monitors](#)

**Commercial mortgage and loan operations:** Reduce risk of external information sharing, improve customer experience, and demonstrate compliance with regulatory requirements

**Departmental operations:** Improve customer/partner collaboration, maintain internal

information barriers, reduce data leakage risk, and improve team productivity

**Post-merger integration:** Accelerate integration activities, improve program management, and reduce data leakage risk

The image is a webinar slide with a blue background. On the left, there is a graphic of a staircase leading up to a white cloud inside a wireframe cube. A large white play button is overlaid on the staircase. In the top left corner is the 'INTRA LINKS' logo. The main title is 'Regulatory Update: Trends in Banking Regulatory Compliance & Emerging Needs for Data Governance and Reporting'. Below the title is the date and time: 'July 16, 2015 1:00 PM ET'. At the bottom, there are three headshots of speakers with their names and titles: Matt McGivern (Data Governance Lead, Protiviti), Christian Albela (Associate Director, Protiviti), and Mark Kalen (Director, Product Strategy, Intralinks). The Protiviti logo is in the bottom left corner.

**Dodd-Frank Impact: 2015 + Beyond: How to navigate a flurry of new rules under low visibility conditions**

18 years of experience supporting mission-critical banking and securities processes



# Capabilities

## User:

- Intuitive and easy to adopt web, mobile and desktop interfaces
- File synchronization, file sharing and content collaboration
- Mobile PDF annotation and in-product native viewing of Microsoft Office files
- 24x7 multilingual end-user support (phone, IM and e-mail)

## Business:

- File- and folder-level permissions, with real-time access logs
- Configurable content templates, tasking and document-centric workflows
- Desktop interface for workspace design and upload of bulk content
- Customer accessible APIs and content integration architecture

## Risk and Security:

- Protection for information at rest (full 256 bit AES encryption, random keys for each file) and in motion (encrypted transport channel, 256 bit AES packet encryption)
- Advanced IRM to protect information in use: plug-in free, support for native Microsoft® Office® and Adobe® PDF files
- Option for customer-managed encryption keys
- Configurable risk and compliance reports
- Support for customer audits and penetration tests (150+ completed)
- Certifications include: ISO 27001: 2013; SOC 2 Type II; and EU Safe Harbor

[Learn more about Intralinks products and platform](#)

## Customers

"The Intralinks VIA iPad application's ease of use has made it much simpler for our directors to access important documents quickly, securely, and efficiently. Many directors don't use high technology in their everyday lives. But now, by reviewing documents from wherever they may be, they can come to meetings already informed, which empowers them make a more effective use of our meeting time."

– Michael Byrne, CEO, Shankill, Ballybrack, & District Credit Union

[Read more](#)



## Resources

### Securely sync, share, collaborate...and manage your business content

Intralinks VIA is an enterprise-class business solution that allows secure file sync, share, collaboration, and management of business content.

[Download Brochure](#)

### A Buyer's Guide to Enterprise Collaboration Solutions

Today, virtual enterprise collaboration is a must-have, and there are many solutions of varying quality and capability to choose from.

[Read Now](#)

## SOLUTIONS

### Intralinks Dealspace®

Streamline the M&A process when you share information more efficiently and securely in the world's leading virtual data room for mergers & acquisitions.

### Intralinks VIA®

Enterprise file sharing made simple. Collaborate freely while maintaining complete control over your content—in a secure document repository accessible across devices.

### Intralinks Dealnexus®

Your next deal begins here. Intelligently and efficiently market & source deal opportunities in real-time, and foster new M&A relationships in the world's largest M&A network.

### Intralinks Studyspace™

Accelerate breakthroughs. Deliver to market faster when you manage clinical trials in a secure online repository built upon real-time information exchange.

### Intralinks DebtSpace™

Broad visibility and tighter control. Execute debt capital market transactions more intelligently and efficiently with Intralinks DebtSpace.

### Intralinks Fundspace™

Designed specifically for alternative investments. Strengthen and grow your fund within the institutional community with our highly-secure, immersive investor reporting platform.

### Intralinks Dealmanager for Corporate Development

To keep the acquisition process moving, your team needs a secure, readily accessible solution that acts as a system of record for all of your deals and helps to standardize the deal process.

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Intralinks Secure Mobile for iPhone and iPad



Intralinks Dealnexus Mobile



Intralinks VIA™ Secure Mobile



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