

Claim 1 of the '494 Patent

A method of analyzing a database with indirect relationships, using links and nodes, comprising the steps of:

selecting a node for analysis;

generating candidate cluster links for the selected node, wherein the step of generating comprises an analysis of one or more indirect relationships in the database;

deriving actual cluster links from the candidate cluster links;

identifying one or more nodes for display; and

displaying the identity of one or more nodes using the actual cluster links.

'494 patent at 51:37-49; see also IPR2013-00480 POR at 3-10.

EXHIBIT 2118

Facebook, Inc. et al. v. Software Rights Archive, LLC

CASES IPR2013-00478

IPR2013-00479

IPR2013-00480

IPR2013-00481

Claim 1 requires there to be an analysis of one or more indirect relationships:

generating candidate cluster links for the selected node, wherein the step of generating comprises **an analysis of one or more indirect relationships in the database;**

'494 patent at 51:37-49; *see also* IPR2013-00480 POR at 3-10.

Petitioners rely upon the cluster splitting process of Fox SMART for the disclosure of generating and deriving cluster links.

IPR2013-00480 Pet. at 16-20; *see also* IPR2013-00480 POR at 16-21.

Jacobs testifies “Clustering using *bc* and/or *cc* is not expressly or inherently disclosed.”

IPR2013-00480 POR at 16-21; *see also* ‘494 Jacobs Decl., IPR2013-00480 Ex 2113 at ¶ 57.

Petitioners Rely on the Following Statement:

The first three values described specify how the overall similarity between documents can be determined **based on available subvectors** - relative weighting, similarity function, and whether real valued weights are allowed.

Fox SMART at 46; IPR2013-00480 Pet. at 17; POR at 18; *see also* '494 Jacobs Decl., IPR2013-00480 Ex 2113 at ¶ 57.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.