

# Petitioner's Arguments

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**EXHIBIT 2121**

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

CASES IPR2013-00478

IPR2013-00479

IPR2013-00480

IPR2013-00481

**ISI**

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## **Petitioners rely upon these statements concerning the experiment of Table 8.7 (“ISI”):**

Apparently, the best combination is to use tm and cc. Regression methods lead to a combined similarity computation which is a 5% improvement over terms alone.

Fox Dec. at ¶ 64; Fox Thesis at 246.

Of all the subvectors, terms are best, though co-citations are not much worse. Author subvectors are not worthwhile, alone or in combination. Using regression or guessed at coefficients, the tm and cc combination yields a 5-6% improvement over the performance when terms alone are used.

Fox Dec. at ¶ 65 Fox Thesis at 247; ‘352 Jacobs Decl., IPR2013-00478 Ex. 2113, at ¶ 287; IPR2013-00478 POR at 32-34.

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'352 Jacobs Decl., IPR2013-00478 Ex. 2113, at ¶ 289.

**Table 8.7: Results of ISI Single Document Feedback  
Using Regression Determined Coefficients**

Combination Cases Name	Cases			Average Precision	% Change vs. Terms Only
	$w_{tm}$	$w_{cc}$	$w_{cd}$		
base	1.0			.246	
guess	.88	.12		.261	+ 6.1
regression1	.83	.17		.259	+ 5.2
regression2	.64		.36	.251	+ 1.7

Thesis, IPR2013-00478 Exhibit 1009 at 241-256; '352 Jacobs Decl., IPR2013-00478 Ex. 2113, at ¶ 287; IPR2013-00478 POR at 32-34.

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**Fox thesis states:**

“Mild improvements for ISI suggested further testing and so the CACM collection was considered.”

‘352 Jacobs Decl., IPR2013-00478 Ex. 2113, at ¶ 289 (citing Fox Thesis at 283); ‘352 Jacobs Decl., IPR2013-00478 Ex. 2113, at ¶ 287; IPR2013-00478 POR at 32-34.



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