

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.

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