

I. “The experimental record showed that the use of indirect relationships generally resulted in worse search results”

Jacobs Dec. at ¶¶ 217-254; 287-296. ‘352 POR at 25-26.

EXHIBIT 2119
Facebook, Inc. et al. v. Software Rights Archive, LLC
CASES IPR2013-00478
IPR2013-00479
IPR2013-00480
IPR2013-00481

Jacobs's Opinions:

- I. **“The experimental record showed that the use of indirect relationships generally resulted in worse search results”. Jacobs Dec. at ¶¶ 217-254; 287-296. ‘352 POR at 25-26.**

- II. **“The experimental record showed that the use of indirect relationships ... was not sufficiently reliable to be used in an automated retrieval system.” Jacobs Dec. at ¶¶ 205-216. ‘352 POR at 25-26.**

Claims Require Indirect Relationships for Search:

52 Claim 26 requires, *inter alia*:

“A non-semantic method ... **for computerized searching** ... comprising:

...

analyzing the first numerical representation **for indirect relationships** existing between or among objects **in the database**;

generating a second numerical representation of each object based on the analysis of the first numerical representation;

storing the second numerical representation **for use in computerized searching**; and **searching the objects in the database** using a computer and the stored second numerical representations, wherein **the search identifies one or more of the objects** in the database.” ‘352 patent at 35:28-53; *see also* IPR2013-00478 POR at 1-4, 50-60.

04 Claim 1 requires , *inter alia*:

“A method of **analyzing a database with indirect relationships, using links and nodes**, comprising ... 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 ... [and] identifying** one or more nodes for display; and displaying the identity of one or more nodes **using the actual cluster links.**”

‘494 patent at 51:38-50; *see also* IPR2013-00478 POR at 1-4, 50-60.

04 Claim 18 requires, *inter alia*:

“A method of analyzing a database having objects and a first numerical representation of direct relationships in the database, comprising ... generating a second numerical representation using the first numerical representation, wherein **the second numerical representation accounts for indirect relationships in the database ... [and] identifying** at least one object in the database, wherein **the stored numerical representation is used to identify objects**” ‘494 patent at 53:43-45; IPR2013-00478 POR at 1-4, 50-60.

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