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.

EXHIBIT 2120
Facebook, Inc. et al. v. Software Rights Archive, LLC
CASES IPR2013-00478
IPR2013-00479
IPR2013-00480
IPR2013-00481

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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.**

Jacobs Testifies: "Dr. Fox Relies on Regression Results, Which Is a Method of Data Analysis, Not a Generalizable Search Method"

"All of the results relied upon by Dr. Fox are based on regression weights, without which Fox Thesis teaches that bc and cc would detract from terms and from ln even more.

A skilled artisan however would understand that regression weights are a means of trying to explain data, not a general method of computerized searching, and certainly not applicable to the claimed method."

IPR2013-00478 POR at 28; '352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 205.

Jacobs Testifies: "Dr. Fox Relies on Regression Results, Which Is a Method of Data Analysis, Not a Generalizable Search Method"

"Regression is a method of statistical analysis that attempts to explain the fit between variables.

Since one has to know the queries and answers in advance, this process is not usable for search in [actual] retrieval environments.

If one has both the queries and responses required to create the regression weights, one does not need Dr. Fox's alleged method to search for responses."

'352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 205-206; IPR2013-00478 POR at 28.

Dr. Salton States:

"Various attempts have been made over the years to construct **enhanced document representations** by using thesauruses of related terms, term association maps, or **knowledge frameworks that can be used to extract appropriate terms and concepts**. **None** of the proposed methods for the improvement of document representation has proved to be **generally useful** when applied to a variety of different retrieval environments."

Salton 86, Ex. 2006, at Abstract; *see also* '352 Jacobs Decl., IPR2013-00478 Ex. 2113 at ¶ 211; IPR2013-00478 POR at 2.

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