Petitioner's Arguments

EXHIBIT 2121
Facebook, Inc. et al. v. Software Rights Archive, LLC
CASES IPR2013-00478
IPR2013-00479
IPR2013-00480
IPR2013-00481

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ISI

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.

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

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

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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