

Kambayashi

IPR2013-00478 POR at 19-24; ‘352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 93-115.

EXHIBIT 2123

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



“Petitioners allege Matrix R is the first numerical representation. Matrix R however cannot be a first numerical presentation because it is not “analyzed” for indirect relationships. Instead, Kambayashi teaches that matrix R is merely multiplied by a constant (W_R) to obtain the Similarity Matrix S. Multiplication by a constant cannot be viewed as an “analysis,” much less an “analysis for indirect relationships” which require the identification of indirect relationships.”

‘352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 105; IPR2013-00478 POR at 19-24.

“Furthermore, the Petition conflates Kambayashi’s ID,IDF pairs and the R matrix. Based on Petitioners’ error, the Board’s Institution Decision suggests the ID,IDF pairs are created from Direct Reference Matrix R. However, to be clear, **Kambayashi does not teach that Matrix R is used to derive ID code pairs,** and in fact, Matrix R **cannot** be used to derive the pairs (or the bibliographic coupling or co-citation values, either).”

‘352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 112; IPR2013-00478 POR at 19-24.

“[I]t is clear that it would not be possible to compute the ID code pairs or the bibliographic coupling and co-citation matrices from the matrix R. Specifically, the direct matrix R is built from the following values:

$r_{ij} = r_{ji} = 1$ if i (or j) refers to j (or i)

Since $r_{ij} = r_{ji}$ in all cases, it is clear that the R matrix is symmetric and thus cannot be used to determine any of the following: the ID code pairs, the bibliographic coupling values, the B and B' matrices, the co-citation values, or the C and C' matrices [because it is not possible to tell which entry is citing and which entry is cited].”

‘352 Jacobs Decl., IPR2013-00478 Exhibit 2113 at ¶ 110 (citing Kambayashi at 92, internal citations omitted); *see also* IPR2013-00478 POR at 19-24.

Claim 26: “searching the objects in the database using a computer **and the stored second numerical representations...**”

“Kambayashi does not disclose any searching step, much less a searching step “using the stored second numerical representations.” The Petition relies on a general statement that “clustering is an important tool for efficient retrieval of documents in bibliographic database systems.” However, “efficient retrieval” can include semantic methods that are explicitly excluded from the claim.”

‘352 Jacobs Dec., IPR2013-00478 Exhibit 2113 at ¶ 115; *see also* IPR2013-00478 POR at 19-24.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.