Exhibit 2052

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Outreach (/actions/outreach)

Friend of the Court Briefs (/actions/friend of the court briefs)

IPRs Filed (/actions/iprs filed)

Amicus Briefs

Court rulings play a critical role in helping to address the problem of asserting low quality patents. The Patent Quality Initiative submits “amicus” – or “friend of the court” – briefs on issues of broad importance and interest in court cases.

Courts are especially important because they have the authority to impose costs and, in appropriate cases, issue more significant sanctions against NPEs who abuse the patent system.

Amicus briefs serve to inform courts of the perspective of small and large companies that rely on strong patents and aim to assist in the development of legal rules and standards that will improve the quality of future patents and decrease frivolous suits.

Below are summaries of recent friend of the court submissions from the

Patent Quality Initiative.

October 21, 2014: PQI files Friend of the Court Brief in *Intellectual Ventures (IV) v. Capital One* Case (/~/media/pqi/files/2014-10-21 - 14-1506 - askeladden amicus brief.pdf?la=en)

PQI filed its *amicus curaie*, or friend-of-the-court brief, through Askeladden L.L.C. in the United States Court of Appeals in the *Intellectual Ventures (IV) v. Capital One* case. The brief supports the lower court's decision holding that two patents owned by IV are invalid because they address routine online and computer-based financial services, and as a result impermissibly patented abstract concepts implemented by computers.

The first patent claims the idea of tailoring communications based on information specific to a user viewing a website. The purported invention selects a set of data that most closely aligns with a user's profile and web-browsing history, and displays that data on a webpage for the user to see. The second patent claims the basic practice of budgeting — i.e., helping credit card users with financial planning. The user's credit card information is conveyed from a point-of-sale device to a processor that categorizes the purchases being made and stores those purchase amounts in a database. If the amounts in a category exceed a pre-set spending limit, the user may be required to give specific approval for a particular purchase.

PQI argues that using a computer or the Internet to perform simple, fundamental processes long in use are not patent-eligible under Section 101 of U.S. Patent Law given the ubiquity of computers and the Internet. The brief also argues that courts should consider a plaintiff's litigation behavior and infringement theories when deciding whether their patents are invalid. Finally, PQI points out the importance of having courts address the issue of whether a patent is invalid because it covers an abstract concept as early as possible. More than half of the cost of defending patent litigation is typically incurred

during discovery, and failure to resolve this basic question at the outset of litigation places pressure on defendants to settle simply to avoid such discovery costs, leaving invalid patents intact.

Download the Friend of the Court Brief (/~/media/pqi/files/2014-10-21 - 14-1506 - askeladden amicus brief.pdf?la=en)

September 15, 2014: PQI Files Friend of the Court Brief in IV v. JPMC Case (/~/media/pqi/files/jpmc amicus brief sept 15 2014.pdf?la=en)

Right to quickly appeal a court's stay decision when a CBM petition has been filed with the USPTO but not yet acted on.

In this case PQI focuses on the narrow issue of a party's right to immediately appeal a district court's decision granting or denying a motion to stay the litigation before the United States Patent and Trademark Office (USPTO) has acted on a petition for a covered business method review.

This is an important issue that Congress sought to address when it created the covered business method (CBM) procedure, Section 18 of the America Invents Act (AIA), as an alternative to costly district court litigation. PQI believes that Section 18 clearly grants a party the right to immediately appeal a district court's decision granting or denying a motion to stay litigation pending CBM review before the USPTO has granted (or denied) the corresponding petition to institute the CBM.

Intellectual Ventures (IV) asserts that the interlocutory appeal provision of Section 18 only applies after the USPTO has granted a CBM petition, and does not apply during the roughly six month period between filing a CBM petition and the USPTO acting on that petition. IV's interpretation contradicts the USPTO's interpretation and the interpretation applied in every district court order regarding contested motions to stay litigation pending CBM review (more than 40 orders have been issued). (The prior sentence is based on information collected as of September 22, 2014.)

PQI filed its brief to explain why the appeal should be permitted as soon as a petition to the USPTO to challenge an issued patent using the CBM procedure is made, even if the USPTO has not yet acted on the request at the time of the motion to stay the infringement proceedings.

The Federal Circuit will likely issue a decision on this issue next year.

Download the JPMC Friend of the Court Brief (/~/media/pqi/files/jpmc amicus brief sept 15 2014.pdf?la=en)

September 3, 2014: PQI Files Friend of the Court Brief in Ultramercial Case (/~/media/pqi/files/ultramercial brief sept 4 2014.pdf?la=en)

What subject matter is eligible for patenting and when should a court decide that issue?

Ultramercial, LLC and Ultramercial Inc. (Ultramercial) obtained a patent on the idea of inserting paid advertisements into online content and then providing that content to people browsing the internet for free. Ultramercial sued Hulu, YouTube, and other companies, claiming that they were infringing Ultramercial's patent.

In August 2010, a federal court in Los Angeles ruled that Ultramercial's patent was invalid because it only covered an abstract idea rather than a patentable invention. Ultramercial appealed to the United States Court of Appeals for the Federal Circuit, which hears all appeals of patent infringement cases. The Federal Circuit twice ruled that Ultramercial's patents were valid, but each time the Supreme Court directed the Federal Circuit to reconsider its decision.

PQI has filed a friend of the court brief to explain why courts should decide, very early in the case, whether a patent covers subject matter that may be eligible for a patent or is just an abstract idea that is not eligible for patenting. The brief notes that many companies use patents not to innovate, but to start lawsuits with the goal of settling the case for a large amount of money. Unfortunately, this strategy is often effective because of the very high costs of going to court for many companies. The brief argues that courts

should curb these extortive tactics by simply evaluating the patent soon after the lawsuit begins and determining whether or not it covers subject matter eligible for patenting.

The brief also argues that Ultramercial's patent is invalid because it only covers an abstract idea. Putting commercials into online content is the same business model that television and radio have long operated on, and nothing in the patent adds to or builds upon that idea in any meaningful way.

The Federal Circuit will likely issue a decision in the coming months.

Download the Ultramercial Friend of the Court Brief (/~/media/pqi/files/ultramercial brief sept 4 2014.pdf?la=en)