Patent Owner's Demonstratives

Google LLC,
v.
Uniloc 2017 LLC,

Case IPR2020-00755
U.S. Patent No. 6,366,908

Oral Hearing
June 15, 2021

Claim 6, the only challenged independen

6. A keyfact-based text retrieving method comprising

keyfact extracting step for analyzing a document collection and a user query, and extracting keyword without part-of-speech ambiguity from said docum collection and said user query, and respectively extracting **keyfacts** of said document collection and said user query from said keywords;

keyfact indexing step for calculating the frequency of **said keyfacts** of said document collection and generating a keyfact list of said document collection for a keyfact index structure; and

keyfact retrieving step for receiving **said keyfact** of sa user query and **said keyfacts** of said document collection and defining a keyfact retrieval model in consideration of weigh factors according to a keyfa pattern and generating a retrieval result.

The "keyfact" term

"keyfact" means "a factual extraction of a sentence which express relation between words in the sentence in the form of [object, p

✓ The parties agree the "keyfact" term is coined by the challenged '908 is not a term of art, and hence the term requires construction.

✓ The '908 patent universally qualifies "**all**" keyfacts as follows:
"**All** keyfacts express semantic relation between words in the form of [object, property]." Ex. 1001, 4:58-60.

✓ **All** "keyfact" examples disclosed in the specification express semant between words in the paired form of [object, property]. POR 7-8, PO (citing Ex. 1001 at Table 1, 1:8-10, 1:16-18, 4:58-60, 6:15-30, and 6:

✓ The Abstract emphasizes the **paired** form of a keyfact as follows:

"A keyfact-based text retrieval method and a keyfact-based text index method that describes the formalized concept of a documen by **a pair** comprising an object that is the head and a property tha is the modifier and uses the information described by the pairs as index information for efficient document retrieval." Ex. 1001, Abst

✓ The paired form of **[object, property]** itself intrinsically conveys ce information. Different information is conveyed, for example, when a tag is represented as an object as opposed to a property, or when tag listed in a particular order. POR 21-22; POSR 16-17.

The "keyfact" term

**The '908 patent specification disparages and distinguish[es]
it refers to as <u>word-based</u> and <u>phrase-based</u> approach[es]**

- ✓ "[T]he **keyword-based** text retrieval method has a fundame[ntal]
  limitation in retrieval precision because it performs docume[nt]
  retrieval by keywords. As a result, because the keyword-bas[ed]
  text retrieval system provides such low level of retrieval
  precision, it causes a number of unnecessary retrievals and
  therefore precious resources, Such as time and effort, are wa[sted]."
  Ex. 1001, 1:32-28.

- ✓ "The **phrase-based** text retrieval methods extract a precise
  phrase pattern though a morphological-syntactic normaliza[tion]
  process and perform indexing and retrieval by extracted phr[ases]."
  Ex. 1001, 1:19–28; see also id., 1:42–45.

The "keyfact" term

The proper construction should reflect all definitive stat[ements]
in the intrinsic evidence, including the explicit disavow[al]

- ✓ The '908 patent universally qualifies "**all**" keyfacts as follow[s]:
  "**All** keyfacts express semantic relation between words in th[e]
  form of [object, property]." Ex. 1001, 4:58-60.

- ✓ The '908 patent **also** states "A keyfact means an important f[act]
  contained in sentences which constitute a document."
  Ex. 1001, 1:15-16.

- ✓ Only Patent Owner has proposed and defended a constructi[on that]
  reflects all definitive statements:

"keyfact" means "a factual extraction of a sentence which expres[ses]
relation between words in the sentence in the form of [object,

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