GOOGLE'S INITIAL INVALIDITY CONTENTIONS

EXHIBIT A-18
Prior Art Reference: WordNet System ("WordNet")

The WordNet system[1] ("WordNet") was publicly known and used at least by 1990 and therefore qualifies as pri[...] U.S.C. §§ 102(a), (b), and (g) and/or 103 as to the asserted claims of U.S. Pat. No. 6,366,908 to Chong et al. ("th[...] WordNet, including any material incorporated by reference into WordNet, anticipates claims 6-12 ("the Asserted[...] Patent under 35 U.S.C. § 102. WordNet also renders obvious the asserted claims under 35 U.S.C. § 103, alone b[...] the art and/or in combination with one or more references identified in Google's Patent Local Rule 3-3 disclosur[...]

To the extent Plaintiff alleges that the WordNet does not disclose any particular limitation of Asserted Claims of[...] either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority[...] Patent to modify the WordNet and/or to combine the teachings of the WordNet with other prior art references, in[...] limited to the present prior art references found in Exhibits A-1 to A-23 and the relevant section of charts for oth[...] '908 Patent in a manner that would have rendered the Asserted Claims invalid as obvious.

With respect to the obviousness of the Asserted Claims under 35 U.S.C. § 103, one or more of the principles enu[...] United States Supreme Court in *KSR v. Teleflex,* 550 U.S. 398 (2007) apply, including: (a) combining various cl[...]

---

[1] WordNet includes all predecessor and subsequent versions of WordNet, and all products (commercial or otherw[...] any of the aforementioned technologies, including the SMART system developed at Cornell University and IRE[...] at University of Nijmegen Netherlands.

[2] Google notes that Uniloc appears in many instances to be pursuing overly broad constructions of various limita[...] claims of the '908 Patent in an effort to piece together an infringement claim where none exists and to accuse a p[...] practice the claims. This claim chart takes into account Uniloc's overly broad construction of the claim limitatio[...] that a particular limitation is disclosed by a prior art reference or references may be based on Uniloc's apparent c[...] not intended to be, and is not, an admission that such constructions are supportable or proper. Google is investig[...] has not yet completed discovery from third parties, who may have relevant information concerning the prior art, [...] University, their affiliated companies, and/or their employees, and therefore, Google reserves the right to supple[...] additional discovery is received. To the extent that any of the prior art discloses the same or similar functionality[...] of the accused products, Google reserves the right to argue that said feature or functionality does not practice any[...] the Asserted Claims, and to argue, in the alternative, that if said feature or functionality is found to practice any l[...] the Asserted Claims of the '908 Patent, then the prior art reference teaches the limitation and that the claim is no[...]

known in the prior art according to known methods to yield a predictable result; and/or (b) making a simple subs
more known elements for another to obtain a predictable result; and/or (c) using a known technique to improve a
method in the same way; and/or (d) applying a known technique to a known device or method ready for improve
predictable result; and/or (e) choosing from a finite number of identified, predictable solutions with a reasonable
success or, in other words, the solution was one which was "obvious to try"; and/or (f) a known work in one fiel
prompting variations of it for use either in the same field or a different field based on given design incentives or
which the variations were predictable to one of ordinary skill in the art; and/or (g) a teaching, suggestion, or mot
that would have led one of ordinary skill in the art to modify the prior art reference or to combine the teachings o
references to arrive at the claimed invention. It therefore would have been obvious to one of ordinary skill in the
disclosures of these references in accordance with the principles and rationales set forth above.

The citations to portions of any reference in this chart are exemplary only. For example, a citation that refers to
or figure item should be understood to also incorporate by reference that figure and any additional descriptions o
forth fully therein. Google reserves the right to rely on the entirety of the references cited in this chart to show tl
Claims are invalid. Citations presented for one claim limitation are expressly incorporated by reference into all
that claim as well as all limitations of all claims on which that claim depends. Google also reserves the right to r
citations or sources of evidence that also may be applicable, or that may become applicable in light of claim cons
Uniloc's infringement contentions, and/or information obtained during discovery as the case progresses.

At least the following documents[3] describe the relevant functionality disclosed by WordNet:

- Julio Gonzalo et al., *Indexing with WordNet Synsets Can Improve Text Retrieval* (1998) ("WordNet Index

- Sanda M. Harabagiu et al., *WordNet 2 – A Morphologically and Semantically Enhanced Resource, in* SIC STANDARDIZING LEXICAL RESOURCES 1 (1999) ("WordNet 2");

- Claudia Leacock et al., *Using Corpus Statistics and WordNet Relations for Sense Identification*, 24 COMI LINGUISTICS, no. 1, at 147 (1998) ("WordNet Sense Identification");

---

[3] Each of the following documents describing WordNet also qualifies as a printed publication under 35 U.S.C. §
and/or 103 in its own right. These documents, alone or in combination with each other, also anticipate or render
Claims, as set forth in the chart below. One of ordinary skill in the art would have ample motivation to combine
because they all describe features and functionality of the same prior art system, WordNet.

- Stan Szpakowicz, *A WordNet-based Algorithm for Word Sense Disambiguation*, *in* 95 IJCAI 1368 (1995 Sense Disambiguation");

- Rila Mandala et al., *The Use of WordNet in Information Retrieval*, *in* USAGE OF WORDNET IN NATURAL I PROCESSING SYSTEMS (1998) ("WordNet Information Retrieval");

- George A. Miller, *Nouns in WordNet: A Lexical Inheritance System*, 4 INT'L J. OF LEXICOGRAPHY, no. 4, ("WordNet Nouns");

- George A. Miller, *WordNet: A Lexical Database for English*, 38 COMMCN'S OF THE ACM, no. 11, at 39 Lexical Database");

- George A. Miller et al., *Introduction to WordNet: An On-line Lexical Database*, 3 INT'L J. OF LEXICOGR (1990) ("Introduction to WordNet");

- Philip Resnik, *Disambiguating Noun Groupings with Respect to WordNet Senses*, *in* NATURAL LANGUAG VERY LARGE CORPORA 77 (1998) ("Disambiguating WordNet Senses");

- R. Richardson et al., *Using WordNet as a Knowledge Base for Measuring Semantic Similarity Between V* ("WordNet Knowledge Base");

- Sam Scott & Stan Matwin, *Text Classification Using WordNet Hypernyms*, USAGE OF WORDNET IN NATU PROCESSING SYSTEMS (1998) ("WordNet Hypernyms");

- Ellen M. Voorhees, *Using WordNet to Disambiguate Word Senses for Text Retrieval*, *in* PROC. OF THE 16 ACM SIGIR CONF. ON RESEARCH AND DEVELOPMENT IN INFORMATION RETRIEVAL 171 (1993) ("Voorhee

- *WordNet*, WIKIPEDIA, *available at* https://en.wikipedia.org/wiki/WordNet (last accessed Aug. 22, 2019) (Wikipedia").

This chart is based on a limited amount of publicly available information that was located regarding WordNet; o describing WordNet also likely anticipates and/or renders obvious the Asserted Claims. Google is in the process for additional information from Princeton University, their affiliated companies and/or their employees and reser supplement this chart after additional discovery is received.

A-18-4