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EXHIBIT C-6
IBM Tivoli Series, "Tivoli Storage Manager: A Technical Introduction" ("Tivoli")

Microsoft contends that the asserted claims of the '132 Patent are invalid as anticipated or obvious by "Tivoli Storage Manager: A Technical Introduction" ("Tivoli") prior art reference under various subsections of 35 U.S.C. § 102 and in view of other prior art references under 35 U.S.C. § 103 as set forth in Microsoft's invalidity contentions.

As Tivoli was published or made publicly available by at least June 2001, Microsoft contends that it is prior art to the '132 Patent under at least pre-AIA 35 U.S.C. § 102(b).

Patent No. 8,671,132	Tivoli
Claim 1	
1[Pre] A policy-based data management system comprising:	To the extent the preamble is limiting, Tivoli discloses a policy-based data management system. Specifically, Tivoli discloses a file management and storage system implementing storage policies. For example, Tivoli states: "Tivoli Storage Manager is the core product of the Tivoli Storage Management product set. It provides a solution for distributed data and storage management in an enterprise network environment. It is the next generation of the product originally released by IBM as ADSTAR Distributed Storage Manager (ADSM). Tivoli Storage Manager protects and manages data on more than 30 operating platforms, covering mobile, desktop and server systems over the entire distributed world. It is integrated with hundreds of storage devices as well as LAN, WAN and emerging SAN infrastructures." Tivoli at 7. "The Tivoli Storage Manager server software builds the data management backbone by managing the storage hardware, providing a secure environment, providing automation, reporting and monitoring functions, and implementing the storage management policies and by storing all object inventory information in the Tivoli Storage Manager database. The Tivoli Storage Manager client software, Tivoli Storage Manager storage agent software, and complementary products implement data management functions like data backup and recovery, archival, hierarchical space management, or disaster recovery." Tivoli at 8. "One of the principal architectural components of the Tivoli Storage Manager server software is its in-built relational database. The storage manager database was especially designed for the task of managing data, and it implements zero-touch administration. All policy information, logging, authentication and security, media management and object inventory is managed through this database. Most of the fields are externalized through Tivoli Storage Manager high level administration

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	commands, SQL SELECT statements or for reporting purposes, by using an ODBC driver." Tivoli at 8-9. "A data storage management environment consists of three basic types of resources: client systems, rules, and data. The client systems contain the data to be managed, and the rules specify how the management must occur; for example, in the case of backup, how many versions should be kept, where they should be stored, and so on. Tivoli Storage Manager policies define the relationships between these three resources. Figure 8 illustrates this policy relationship. Depending on your actual needs for managing your enterprise data, these policies can be very simple or very complex." Tivoli at 20. To the extent that it is argued that Tivoli does not disclose all or part of this limitation, it would have been at least obvious to combine it with any other reference disclosing this limitation as explained in Microsoft's Preliminary Invalidity Contention Cover Pleading.
1[a] a policy set comprising at least one service class rule;	Tivoli discloses a policy set comprising at least one service class rule. Specifically, Tivoli discloses a policy set executed by the ACS routines to select management classes for files. For example, Tivoli states: "2.2.3 Policy Concepts "A data storage management environment consists of three basic types of resources: client systems, rules, and data. The client systems contain the data to be managed, and the rules specify how the management must occur; for example, in the case of backup, how many versions should be kept, where they should be stored, and so on. Tivoli Storage Manager policies define the relationships between these three resources. Figure 8 illustrates this policy relationship. Depending on your actual needs for managing your enterprise data, these policies can be very simple or very complex.

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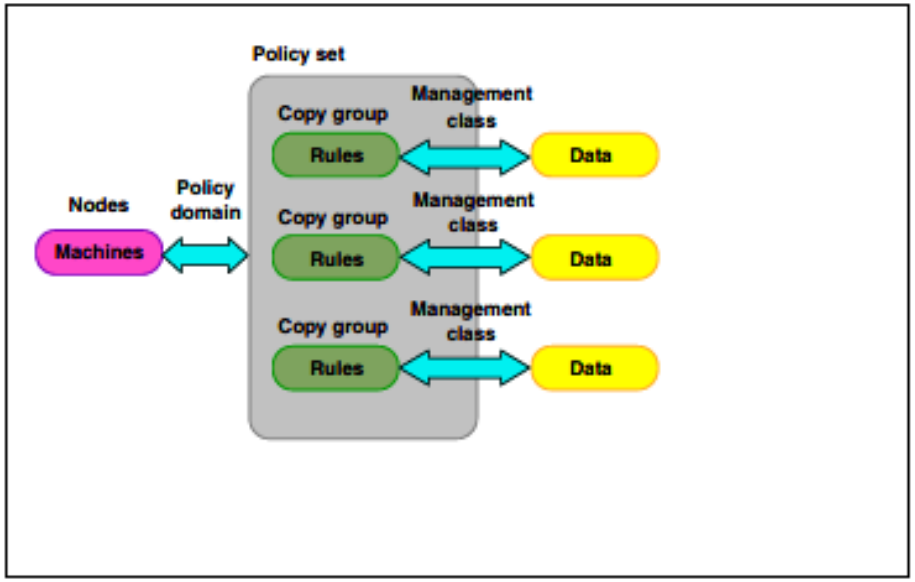

Figure 8. Policy relationships and resources

Tivoli Storage Manager has certain logical entities that group and organize the storage resources and define relationships between them. Client systems, or nodes in Tivoli Storage Manager terminology, are grouped together with other nodes with common storage management requirements, into a policy domain.

The policy domain links the nodes to a policy set, a collection of storage management rules for different storage management activities. A policy set consists of one or more management classes. A management class contains the rule descriptions called copy groups, and links these to the data objects to be managed. A copy group is the place where all the storage management parameters, such as number of stored copies, retention period, storage media, and so on, are defined. When the data is linked to particular rules, it is said to be bound to the management class that contains those rules.

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	Another way to look at the components that make up a policy is to consider them in the hierarchical fashion in which they are defined. That is to say, consider the policy domain containing the policy set, the policy set containing the management classes, and the management classes containing the copy groups and the storage management parameters." Tivoli at 20. To the extent that it is argued that Tivoli does not disclose all or part of this limitation, it would have been at least obvious to combine it with any other reference disclosing this limitation as explained in Microsoft's Preliminary Invalidity Contention Cover Pleading.
1[b] a file evaluation module configured to apply the service class rule to assign a service class to a file;	Tivoli discloses a file evaluation module configured to apply the service class rule to assign a service class to a file. Specifically, Tivoli discloses software programs to apply rules to assign a management class to a file. For example, Tivoli states: "2.2.3 Policy Concepts "A data storage management environment consists of three basic types of resources: client systems, rules, and data. The client systems contain the data to be managed, and the rules specify how the management must occur; for example, in the case of backup, how many versions should be kept, where they should be stored, and so on. Tivoli Storage Manager policies define the relationships between these three resources. Figure 8 illustrates this policy relationship. Depending on your actual needs for managing your enterprise data, these policies can be very simple or very complex.

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	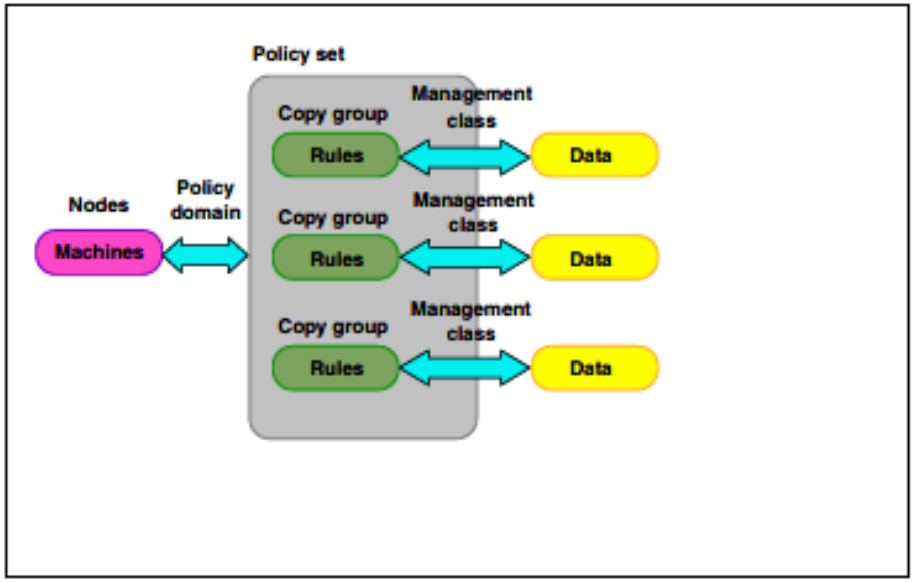 *Figure 8. Policy relationships and resources* Tivoli Storage Manager has certain logical entities that group and organize the storage resources and define relationships between them. Client systems, or nodes in Tivoli Storage Manager terminology, are grouped together with other nodes with common storage management requirements, into a policy domain. The policy domain links the nodes to a policy set, a collection of storage management rules for different storage management activities. A policy set consists of one or more management classes. A management class contains the rule descriptions called copy groups, and links these to the data objects to be managed. A copy group is the place where all the storage management parameters, such as number of stored copies, retention period, storage media, and so on, are defined. When the data is linked to particular rules, it is said to be bound to the management class that contains those rules.

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