

To the extent that any of the following are prior art, Google reserves the right to rely upon foreign counterparts of the U.S. patents identified herein; U.S. counterparts of foreign patents and foreign patent applications identified herein; and U.S. and foreign patents and patent applications corresponding to articles and publications identified herein. Google also reserves the right to rely upon parent or ancestor patents or patent applications from which any of the patents or patent applications identified herein claim priority to as continuation, divisional, or continuation-in-part applications. Identification of dates of publication are made based on currently available information, and Google reserves the right to rely upon an earlier date should evidence supporting an earlier date be discovered.

Title & Defined Term	Author/Inventor	Issue/Publication Date	Country of Origin
Patents			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
U.S. Patent No. 7,533,407 ("Lewis '407")	Elliot D. Lewis	5/12/2009	United States
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[illegible]

B. Prior Art Under 35 U.S.C. § 102(e) and 35 U.S.C. § 102(g)

K.Mizra has neither alleged nor provided sufficient evidence of a conception date for the Asserted Claims earlier than the claimed priority date on the face of the Asserted Patents. Should the Court permit K.Mizra to provide evidence of an earlier conception date, Google may assert that any of the § 102(a) prior art is § 102(e) or § 102(g) prior art.

V. INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103

Each of the Asserted Claims are invalid under 35 U.S.C. §§ 102 or 103 in view of one or more of the references identified above in Section IV, alone or in combination. Pursuant to the OGP, and subject to Google's reservation of rights, Google attaches claim charts hereto that are direct to the prior art references that anticipate each of the Asserted Claims under 35 U.S.C. §§ 102(a), (b), (e), and/or (g) either expressly or inherently, and/or the prior art references that, in the alternative, would have rendered the Asserted Claims obvious under 35 U.S.C. § 103. *See* Exhibits 1-17. Some claim charts also contain explanations about the motivation to combine the references. Additional explanations regarding the motivation to combine the references is below in Section VI. Any combinations contained or reference cited herein may be combined with any other reference to demonstrate the invalidity of any of the Asserted Claims, as set forth below and in Exhibits 1-17.

To the extent any claim limitation is construed to have a similar meaning, or to encompass similar feature(s) and/or function(s), as any other claim limitation, the citations to prior art references for each of those claim limitations in Google's claim charts are incorporated by reference with respect to each other.

Pursuant to the OGP, Google has attached exhibits containing claim charts setting forth where in the prior art references each element of the asserted claim(s) are found and identifying examples of prior art that anticipate or render obvious each of the Asserted Claims.