

FOR SETTLEMENT PURPOSES ONLY PURSUANT TO FRE 408

Jan 7th, 2020

Mr James Buatti
Sr Legal Counsel
Wikimedia Foundation (Wikipedia)
1 Montgomery Street Suite 1600
San Francisco, CA 94105

Re: Infringement of WordLogic Patents by Wikipedia Inc.

Dear Mr Buatti:

We represent WordLogic Corporation and 602531 British Columbia Ltd. (collectively referred to herein as “WordLogic”) in the licensing and enforcement of WordLogic’s United States Patent Nos. 7,293,231 (“the ‘231 patent”), 7,681,124 (“the ‘124 patent”), 7,716,579 (“the ‘579 patent”) and 8,552,984 (“the ‘984 patent”). I am writing to familiarize you with the WordLogic patents, advise you of WIKIPEDIA’s infringement and hopefully reach an amicable resolution of this issue.

Generally, the WordLogic patents are directed to methods and systems for processing text and data entry on personal computers, handheld devices and other touch screen devices. More specifically, the claims of the patents cover various predictive text touch keyboards for handheld devices, as well as the predictive text features and functionality of many websites, media players, navigational systems and game consoles. Please find enclosed copies of the ‘231, ‘124, ‘579 and ‘984 patents.

As shown in the claim chart below, the predictive text search box featured on the WIKIPEDIA website infringes at least claim 19 of the ‘124 patent, and likely other claims in the WordLogic patents. We hope that WIKIPEDIA will work with us to reach a reasonable and amicable resolution of this matter.

BACKGROUND

WordLogic is a global leader and innovator in the field of predictive text input technology for computerized devices. WordLogic has been developing its proprietary technology since the late 1990’s. WordLogic’s technology has been recognized as a leader in the field, including the 2014 North American Enabling Technology Leadership Award for Predictive Keyboard Applications.

WordLogic's patented technology was developed for use on a wide variety of devices and applications, including PC's, smart phones, tablets, websites, media players, navigational systems and game consoles, and licensed for use on many popular products on the market today. In addition to licensing, WordLogic has incorporated its patented technology in its own products, including iKnowU®, a contextually aware predictive keyboard for mobile devices that makes typing easier, faster and more accurate for mobile users. WordLogic's technology also includes Gesturing and Wordchunking, features that increase the speed and accuracy of typing. WordLogic's Reach™ technology understands the context of what a person is typing, and instantly provides access to other applications or data sources to retrieve relevant information. Please see www.wordlogic.com for additional information on WordLogic's products and technology.

WordLogic has been actively pursuing the licensing and enforcement of its patented technology since 2012. Since that time, dozens of companies have become licensed under the WordLogic patents. We are currently contacting companies utilizing WordLogic's patented predictive text technology in the hope of reaching a reasonable licensing arrangement that will allow them to continue utilizing the technology.

The '124 patent and the '984 patent are the subject of ongoing litigation initiated in the Northern District of Illinois in a matter entitled *WordLogic Corp. et al v. Fleckys, Inc.*, 16 CV 11714 (N.D. Ill. Feb. 2, 2017)—now transferred to the Northern District of California. In this case, the '124 patent was challenged under §101 of the Patent Act **and that challenge was denied**. Furthermore, claim 19 described in detail below was specifically analyzed under §101 in the Opinion and Order denying the challenge.

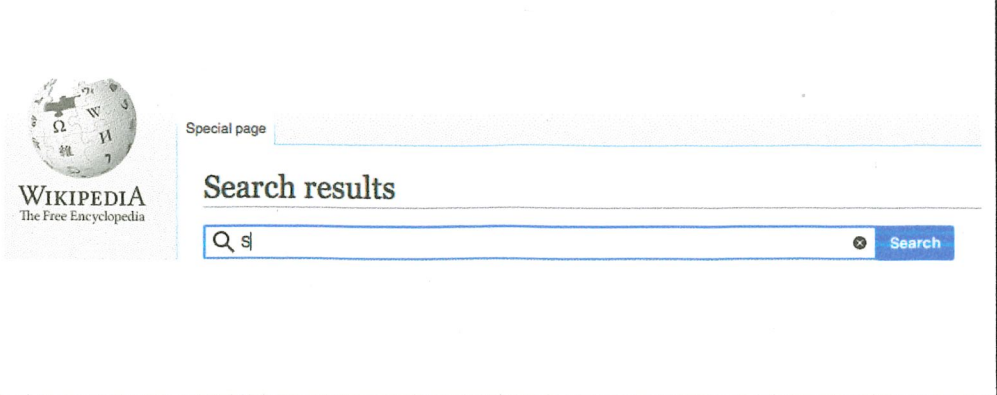
WIKIPEDIA'S INFRINGEMENT OF THE WORDLOGIC PATENTS

Please have your patent lawyers carefully review the claims of WordLogic's patents. We are confident that we can prove that WIKIPEDIA directly infringes claims of at least the '124 patent. A representative claim chart detailing direct infringement of claim 19 of the '124 patent is shown below.

US. Patent No. 7,681,124 Claim 19	WIKIPEDIA Website
19. A computer-readable medium comprising codes for directing a processing unit to process text entered into a personal computing device, by:	<p>The WIKIPEDIA website includes a predictive text search box that operates on software that directs a processing unit on how to process text that is entered in the search box from a personal computer or personal handheld computing device.</p> <p>https://en.wikipedia.org/w/index.php?search</p>

(a) receiving and displaying a partial text entry, comprising receiving at least part of the partial text entry via a keyboard, the partial text entry comprising at least a first character;

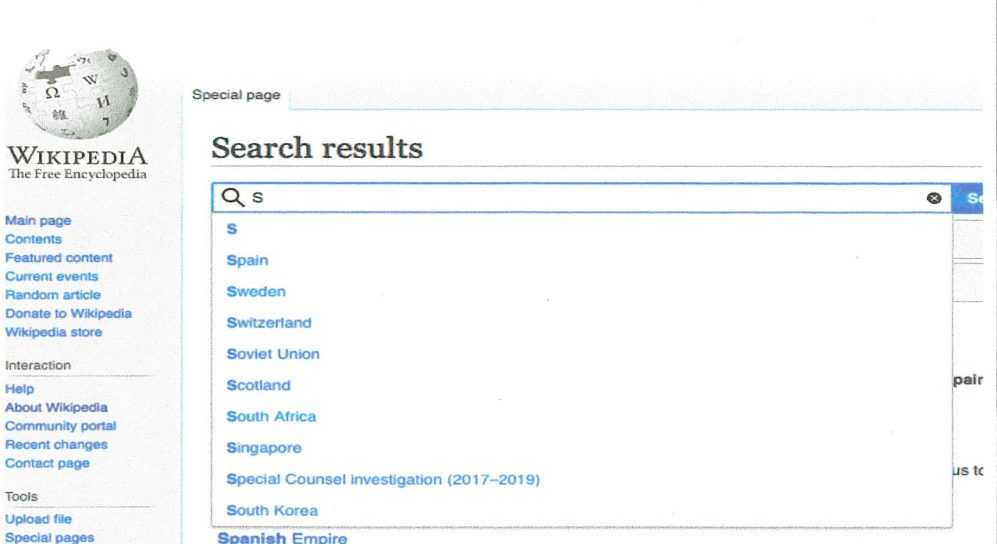
The predictive text search box receives and displays text in the search box.



(b) in response to receipt of the first character of the partial text entry, obtaining a plurality of completion candidates from among a group of completion candidates, wherein each of the plurality of completion candidates includes a portion matching the partial text entry;

In response to the first character typed, the website obtains a plurality of completion candidates, and each completion candidate includes a portion that matches the first character typed.

For example, typing the letter "S" generates the following list of completion candidates:



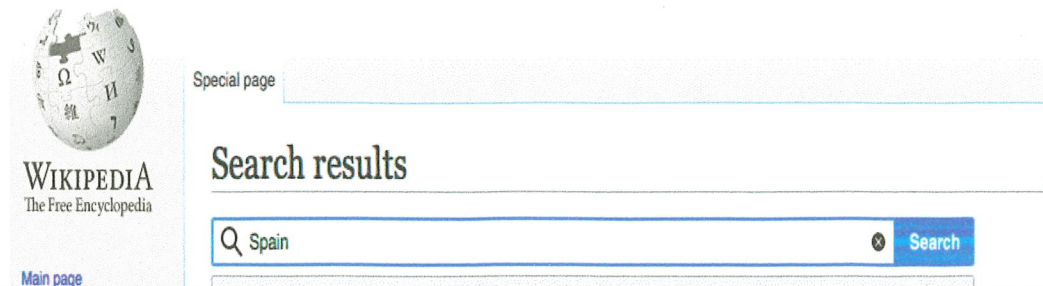
(c) displaying the plurality of completion candidates in a search list within a graphical user interface;

The completion candidates are displayed in a search list on a computer screen or the screen of a handheld personal device.

(d) detecting user input corresponding to selection of a particular completion candidate from among the plurality of completion candidates displayed in the search list;

The website detects user input, namely, clicking on a particular completion candidate in the search, that corresponds with selecting a particular completion candidate.

For example, "Spain" may be selected from the search list by clicking on it.



(e) modifying the display of the partial text entry to correspond to the particular completion candidate selected from among the plurality of completion candidates at least while the particular completion candidate remains selected;

When a particular completion candidate is selected, the search term displayed in the search box is modified to match the completion candidate selected.

For example, if "Spain" is selected from the search list, the search term displayed in the search box is modified.



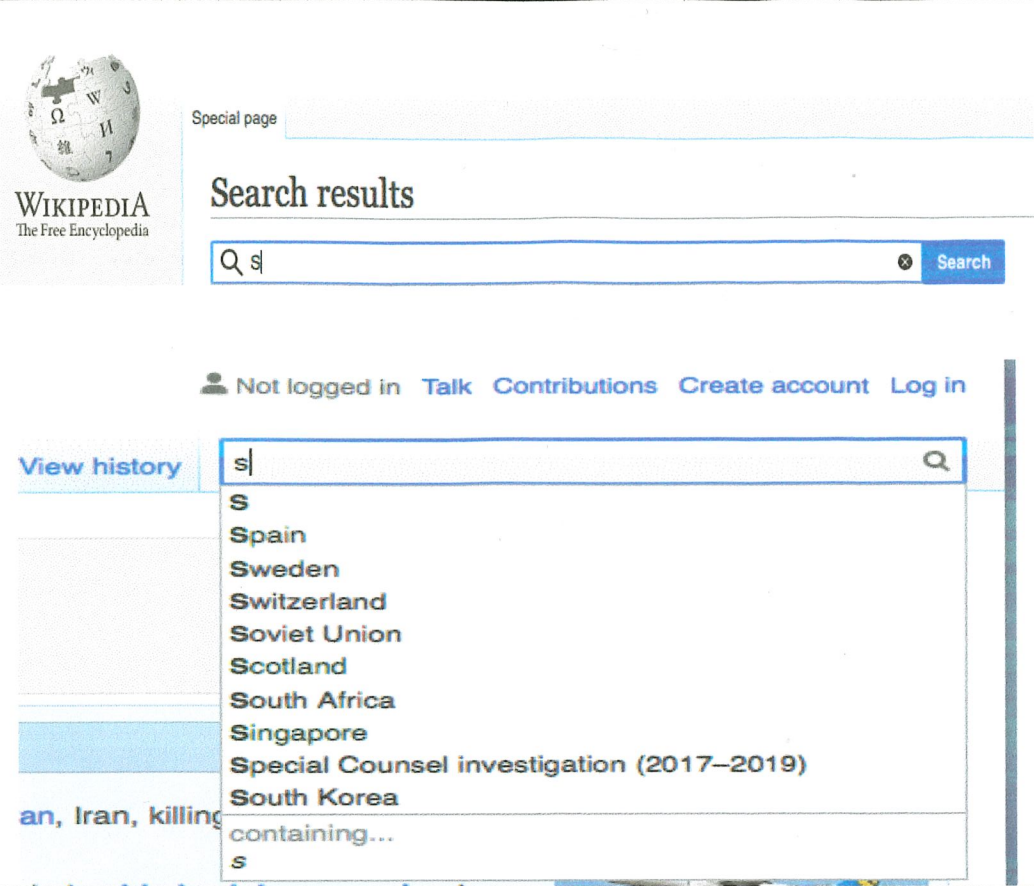
(f) detecting modification of the partial text entry by the user via the keyboard;

The website detects modification of the search term by a user via a keyboard, which may be by adding letters to the search term, or by deleting letters from the search term.

(g) obtaining and displaying in the search list

Modification of the search term via a keyboard causes a new search list to be obtained and displayed. Each of the modified plurality of completion candidates in the search list includes a portion that matches the modified search term, as shown below.

a modified plurality of completion candidates from among the group of completion candidates, if the partial text entry is modified via the keyboard, wherein each of the modified plurality of completion candidates includes a portion matching the partial text entry; and



(h) obtaining and displaying in the search list a further modified plurality of completion candidates from among the group of completion candidates, if a completion candidate is accepted via the search list from the modified plurality of completion candidates,

If one of the new completion candidates is selected from the modified search list, a further modified list of completion candidates is obtained and displayed. Each of the further modified plurality of completion candidates in the search list includes a portion that matches the selected search term.

For example, if “Spaniards” is selected from the search list, the following list of further modified completion candidates is displayed.

wherein each of the further modified plurality of completion candidates includes a portion matching the accepted completion candidate.



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professional rugby union player for Worcester Warriors; considered the greatest Spaniard to ever play the game C6
57 KB (5,326 words) - 08:49, 2 January 2020

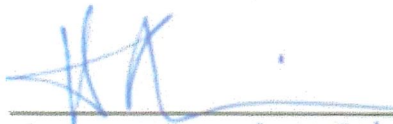
CONCLUSION

We recognize that WIKIPEDIA has several options for addressing WordLogic's infringement concerns, including litigation and/or WIKIPEDIA attempting to invalidate the patents by filing an Inter Partes Review (IPR) with the Patent Office. Although we are confident in the validity and infringement of the WordLogic patents, we appreciate the inherent risks and costs to a patent owner in pursuing litigation and/or facing the uncertainties of IPR proceedings. To that end, and to encourage the continued use of WordLogic patented technology, WordLogic is offering a discounted, lump sum fee of \$30,000 in exchange for a paid-up one-time license.

Please contact me at 512-791-7963 or artoush@ohanianip.com to discuss a licensing arrangement, or let me know if you need additional time to review. You may also contact WordLogic Licensing agent Pete Sirianni at (561)699-8043 or at siriannip07@me.com. If I do not hear from you by that date I will assume you are not interested in discussing a quick resolution, and we will proceed with the litigation.

Thank you for your consideration, and I look forward to working with you.

Sincerely,



H. Artoush Ohanian