UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES & COMPANY, INC.
200 Liberty Street
New York, New York 10281

Plaintiff,

v.

ABLAISE LTD. ("Ablaise")
40 Queen Anne Street
London W1G 9EL
United Kingdom

and

GENERAL INVENTIONS
INSTITUTE A, INC., ("GIIA")
Craigmuir Chambers
P.O. Box 71
Town Road
Tortola, British Virgin Islands

Defendants.

Civil Action No. 1:06CV01014

Judge James Robertson

DOW JONES REUTERS
BUSINESS INTERACTIVE, LLC
200 Liberty Street
New York, New York 10281

Plaintiff,

v.

ABLAISE and GIIA

Defendants.

Civil Action No. 1:06CV01015

Judge James Robertson

AFFIDAVIT OF ANDREW M. RITCHIE IN SUPPORT OF ABLAISE LTD. AND GENERAL INVENTIONS INSTITUTE A, INC.'S RESPONSIVE MARKMAN BRIEF

I, Andrew M. Ritchie, being first duly sworn, on oath state:

1. I am one of the named inventors of U.S. Patent Nos. 6,295,530 and 6,961,737. I have been working in the field of computer networks and internet technologies for 20 years. I am a computer consultant and have been an employee of ICL (International Computers Limited), Informix Software, British Airways, Motorola Cellular, and Logical Networks, Ltd. I am one of the founding members of both Point4 Consulting Ltd. and Ablaise Ltd., which are described in more detail below.

The Genesis of the Inventions

2. In the spring of 1994, before the Internet was widely used, I was approached by a businessman interested in creating an online version of the Freemans catalogue. Freemans was a very large retail company in the United Kingdom that maintained a catalog similar to that of Sears in the United States.
3. I began to work on a technical design for Freeman's website, and I planned to make a single webpage for each item in the catalogue. But I quickly realized that creating a single webpage for each and every item in the catalogue would mean that I would need to hand write nearly 10,000 web pages. I subsequently decided to automate the process of creating the web pages, so that I would have a program automatically create all the pages. But in 1994, hard drive space was very expensive, so that was not an ideal solution.
4. Despite these initial obstacles, I eventually came up with the idea to create a program that would automatically create a web page after a person clicked on a link to request the page. After recognizing that a program could be built to generate web pages "on the fly,"

I thought about how I could extend that capability to provide web pages to users in a way that had never before been possible. It was at this point that I decided that the program could utilize identification information sent from a browsing device to customize a web page it created on the fly to fit the needs and preferences of the user requesting the page. This ability to change the formatting of pages based on identifiers sent from the browser became the basis for the '530 and '737 patents.

Point4 Consulting Ltd.

5. In October 1994, I founded a web development company called Point4 Consulting Ltd. along with three friends. One of the co-founders was Jon Bradshaw, the co-inventor listed on the '530 and '737 patents. Mr. Bradshaw had extensive software development experience based on his experience with network applications and TCP/IP implementations for ICL, the United Kingdom's largest computer manufacturer.
6. I discussed my idea of dynamically creating web pages that included both content and formatting corresponding to user preferences with Mr. Bradshaw. During the winter of 1994 to 1995, Mr. Bradshaw and I developed an internet application called Virtual Database Online (VDL). VDL was a simple prototype that allowed a server to create web pages on-the-fly in response to identifiers that identified the content and/or format preferred by the user.
7. After the creation of the VDL system, Mr. Bradshaw and I began designing and writing web applications that created web pages on-the-fly for numerous business. Point4 created on-the-fly web applications for many high profile businesses in the United Kingdom,

including the Electronic Telegraph, Cellnet, MTV Networks Europe, Sony Computer Entertainment Europe, United Airlines, IPC magazines, and many others.

8. In fact, the Telegraph received several awards for the online version of its newspaper based on Point4's on-the-fly web site creation technology.

9. In October 1999, we sold Point4 to Nettec Ltd., but Mr. Bradshaw and I always retained ownership of the patents. Mr. Bradshaw and I licensed the patents to Nettec for three years.

Ablaise Ltd.

10. As inventors of the claimed inventions in the '530 and '737 patents, Mr. Bradshaw and I realized that many companies were using the technology that we invented to provide custom-formatted web pages to users. After selling our Point4 business to Nettec, we decided to create Ablaise Ltd. (with essentially the same shareholders as Point4) in order to enforce our intellectual property rights.

11. In April 2002, Mr. Bradshaw and I assigned ownership of the '530 patent and the pending application that led to the '737 patent to our new company, Ablaise Ltd.

12. Ablaise Ltd. is now actively enforcing its rights against many large corporations. As part of this effort, Ablaise has already successfully licensed its invention to organizations including: Dell, Citigroup, and E*Trade Financial.

Dated: this 3rd day of APRIL, 2007.

Andrew M. Ritchie

SUBSCRIBED and sworn to before me this 3rd day of APRIL, 2007.

MARTIN ANTHONY CHARLTON
Notary Public of London, England
My Commission expires with life.

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