

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

PERSONALIZED USER MODEL, LLP

Plaintiff,

v.

GOOGLE INC.

Defendant.

C.A. No. 09-525-JJF

**DECLARATION OF JOHN LABARRE IN
SUPPORT OF GOOGLE'S MOTION TO
TRANSFER VENUE TO THE
NORTHERN DISTRICT OF
CALIFORNIA**

John LaBarre states:

1. I am an employee of Google, Inc. I work at Google, Inc.'s Mountain View, California headquarters. I have been a Google employee since April 2009. As a member of Google's legal department, I am familiar with Google's products and services as well as its history.

2. Google has been headquartered in Northern California since its founding in 1998 and is currently headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

3. Google employs more than 7,100 people in its Mountain View offices, including engineers, product managers, executives, and staff.

4. The majority of the development work for Google Search, Google Personalized Search and iGoogle took place in Mountain View, CA. The operation of relevant aspects of these services are currently led by teams in Google's Mountain View offices. The lead engineers and product managers working on these services are located in Mountain View.

5. Google does not have an office or a physical corporate presence in Delaware.

6. I am currently aware of the following Google employees who have relevant knowledge regarding the subject matter of this litigation, all of whom work in Google's Mountain View headquarters and reside in Northern California:

- Bryan Horling, Engineering Lead for Personalized Search
- Matthew Kulick, Associate Product Manager responsible for Personalized Search.
- Jonathan Alferness, Group Product Manager for Ads Quality.

7. I am not currently aware of any specific individuals with relevant knowledge regarding the subject matter of this litigation who reside in Delaware.

8. The technical details of how Google's products work, such as those contained in source code and technical documentation, are highly proprietary, confidential, and valuable to Google, and exposing them to the risk of a confidentiality breach would impose a hardship upon Google.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Mountain View, California on September 8, 2009.

Respectfully submitted,

/s/ John LaBarre
John LaBarre

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on September 8, 2009, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on September 8, 2009, the attached document was Electronically Mailed to the following person(s):

Karen Jacobs Louden
Jeremy A. Tigan
Morris, Nichols, Arsht & Tunnell LLP
1201 North Market Street, 18th Fl.
P.O. Box 1347
Wilmington, DE 19899-1347
klouden@mnat.com
jtigan@mnat.com

Marc S. Friedman
Sonnenschein Nath & Rosenthal LLP
1221 Avenue of the Americas
New York, NY 10020-1089
mfriedman@sonnenschein.com

Yar R. Chaikovsky
Jimmy M. Shin
Jennifer D. Bennett
Sonnenschein Nath & Rosenthal LLP
1530 Page Mill Road, Ste. 200
Palo Alto, CA 94304-1125
ychaikovsky@sonnenschein.com
jshin@sonnenschein.com
jbennett@sonnenschein.com

/s/ David E. Moore _____
Richard L. Horwitz
David E. Moore
D. Fon Muttamara-Walker
POTTER ANDERSON & CORROON LLP
(302) 984-6000
rhowitz@potteranderson.com
dmoore@potteranderson.com
fmuttamara-walker@potteranderson.com