

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PERSONALIZED USER MODEL, L.L.P.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 09-525 (LPS)
)	
GOOGLE, INC.,)	
)	
Defendant.)	


NOTICE OF RULE 30(b)(6) DEPOSITION OF GOOGLE, INC.

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiff Personalized User Model, L.L.P. (“P.U.M.”) will take the deposition of Defendant Google, Inc. (“Google”) concerning the topics identified in Schedule A, beginning at 9:00 a.m. on February 25, 2011, or at an otherwise mutually agreeable date, and will be held at the offices of SNR Denton US LLP, 1530 Page Mill Road, CA 94304, or at an otherwise mutually agreeable location. If the deposition is not completed on the date set out above, the taking of the deposition will continue day to day thereafter or pursuant to the parties’ agreement. The deposition will be recorded by stenographic, videographic, and/or audiographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Google is directed to designate one or more officers, directors, or managing agents, or other persons who will testify on its behalf, who are most knowledgeable regarding the matters identified in the attached Schedule A. Google is requested to provide a written designation of the names and positions of the officers, directors, managing agents, or other persons designated to testify concerning the matters identified in the attached Schedule and, for each person, identify the matters on which he or she will testify.

P.U.M. reserves the right to serve additional 30(b)(6) notices.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP



Karen Jacobs Loudon (#2881)
Jeremy A. Tigan (#5239)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
klouden@mnat.com
jtigan@mnat.com

OF COUNSEL:

Marc S. Friedman
SNR Denton US LLP
1221 Avenue of the Americas
New York, NY 10020-1089
(212) 768-6700

Jennifer D. Bennett
SNR Denton US LLP
1530 Page Mill Road, Ste. 200
Palo Alto, CA 94304-1125
(650) 798-0300

*Attorneys for Plaintiff Personalized User Model,
L.L.P.*

January 21, 2011
4052069

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

1. The term "P.U.M." means Personalized User Model, L.L.P., including all of its current and past officers, directors, agents, employees, consultants, attorneys, and others acting or purporting to act on behalf of Personalized User Model, L.L.P., including all predecessors, subsidiaries, parents, affiliates, and successors.

2. The term "Google" means Google, Inc., including all of its current and past officers, directors, agents, employees, consultants, attorneys, and others acting or purporting to act on behalf of Google, Inc., including all predecessors, subsidiaries, parents, affiliates, and successors.

3. The term "SRI International" or "SRI" means SRI International, including all of its current and past officers, directors, agents, employees, consultants, attorneys, and others acting or purporting to act on behalf of SRI, including all predecessors, subsidiaries, parents, affiliates, and successors.

4. The term "document" is synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including without limitation electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

5. The term "person" means any natural person or any business, legal or governmental entity, or association.

6. The term "concerning" means relating to, referring to, describing, evidencing, or constituting.

7. The terms “all” and “each” when used individually shall be construed as both all and each.

8. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery requests all relevant responses that might otherwise be construed to be outside of its scope.

9. The use of the singular form of any word includes the plural and vice versa.

10. The term “including” means “including but not limited to.”

11. The term “relating to” means relating to, referring to, concerning, mentioning, reflecting, pertaining to, evidencing, involving, describing, depicting, discussing, commenting on, embodying, responding to, supporting, contradicting, or constituting (in whole or part), as necessary to bring within the scope of the request all relevant responses that might otherwise be construed to be outside of its scope.

12. The term “the ’040 Patent” means U.S. Patent No. 6,981,040 B1, entitled “Automatic, Personalized Online Information and Product Services.”

13. The term “the ’031 Patent” means U.S. Patent No. 7,320,031 B2, entitled “Automatic, Personalized Online Information and Product Services.”

14. The term “the ’276 Patent” means U.S. Patent No. 7,685,276 B2, entitled “Automatic, Personalized Online Information and Product Services.”

15. The terms “the patents-at-issue” or “the patents-in-suit” mean the ’040 Patent, and ’276 Patent, individually or collectively, and any other asserted patents in this litigation.

16. Grammar and syntax, as used in this Notice, shall be construed and interpreted to give proper meaning and consistency to their context. By way of illustration and not by way of limitation, the singular form of words may include the plural and the plural form of words may apply to each individual person and/or thing, and the use of any gender or tense may be construed to include all genders and tenses, wherever appropriate in these interrogatories, to bring within their scope any relevant information which might otherwise be construed to be outside their scope.

17. Unless otherwise indicated, the use of the name of any party, person, or business organization in the Notice shall specifically include all agents, employees, shareholders, owners, officers, directors, joint ventures, representatives, attorneys, and all other persons acting on behalf of the subject party, person, or business organization.

TOPICS OF DEPOSITION

1. All facts and circumstances, including but not limited to all communications whether written, oral or otherwise, between Google and SRI International concerning all transactions, contracts, agreements and understandings, and payments between Google and SRI International concerning the patents-in-suit or any invention(s) claimed therein, and/or Yochai Konig.

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered participants.

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on January 21, 2011, upon the following individuals in the manner indicated:

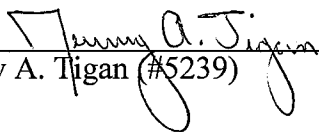
BY E-MAIL

Richard L. Horwitz
David E. Moore
POTTER ANDERSON & CORROON LLP
1313 N. Market St., 6th Floor
Wilmington, DE 19801

BY E-MAIL

Brian C. Cannon
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, CA 94065

Charles K. Verhoeven
David A. Perlson
Antonio R. Sistos
Eugene Novikov
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111



Jeremy A. Tigan (#5239)