

EXHIBIT 1

From: Bennett, Jennifer D. [jennifer.bennett@snrdenton.com]
Sent: Tuesday, February 01, 2011 7:47 PM
To: Eugene Novikov; Friedman, Marc S.; Nelson, Mark C.; jtigan@mnat.com; klouden@mnat.com
Cc: Google-PUM; rhorwitz@potteranderson.com; dmoore@potteranderson.com
Subject: Re: PUM v. Google - deposition dates

Gene-

You are correct that PUM will not be available on the 7th to take the SRI deposition. Please provide alternate dates with the witness' availability.

I will get back to you regarding Jeh on the 8th, however, it is also unlikely PUM is available. Please provide alternate dates when he is back in the country.

Thanks,

Jennifer D. Bennett
Managing Associate
SNR Denton US LLP
D +1 650 798 0325
jennifer.bennett@snrdenton.com
snrdenton.com

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From: Eugene Novikov <eugenenovikov@quinnemanuel.com>
To: Bennett, Jennifer D.; Friedman, Marc S.; Nelson, Mark C.; jtigan@mnat.com <jtigan@mnat.com>; klouden@mnat.com <klouden@mnat.com>
Cc: Google-PUM <Google-PUM@quinnemanuel.com>; rhorwitz@potteranderson.com <rhorwitz@potteranderson.com>; dmoore@potteranderson.com <dmoore@potteranderson.com>
Sent: Tue Feb 01 20:15:46 2011
Subject: PUM v. Google - deposition dates

Jennifer, on the call we offered the afternoon of February 7 for the 30(b)(6) deposition regarding SRI. As we have not heard from you we assume Plaintiff is not interested in that date. If we are wrong, please let us know immediately. Please note that the witness's availability after February 7 is limited and we may not be able to get you another date in the coming weeks.

Additionally, Glen Jeh is available to be deposed on February 8, and will be out of the country for several weeks thereafter. Please let us know if Plaintiff will take his deposition on February 8.

Eugene Novikov
Associate
Quinn Emanuel Urquhart & Sullivan, LLP

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San Francisco, CA 94111
415.875.6308 Direct
415.875.6600 Main Office Number

415.875.6700 FAX
eugenovikov@quinnemanuel.com
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EXHIBIT 2

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WRITER'S DIRECT DIAL NO.
(415) 875-6308

WRITER'S INTERNET ADDRESS
eugenenovikov@quinnemanuel.com

January 12, 2011

VIA EMAIL AND FEDEX

Jennifer Bennett
SNR Denton
1530 Page Mill Road
Suite 200
Palo Alto, CA 94304-1125

Re: *Personalized User Model LLP v. Google Inc.*, C.A. No. 09-00525-LPS

Dear Jennifer:

Enclosed please find a CD of documents produced by third party SRI International in response to Google's subpoena.

Very truly yours,

/s/

Eugene Novikov

Enclosures

EN/dq

quinn emanuel urquhart & sullivan, llp

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WRITER'S INTERNET ADDRESS
eugenenovikov@quinnemanuel.com

January 19, 2011

VIA EMAIL

Jennifer Bennett
SNR Denton LLP
1530 Page Mill Road
Suite 200
Palo Alto, CA 94304-1125

Marc Friedman
Mark C. Nelson
SNR Denton LLP
1221 Avenue of the Americas
New York, NY 10020-1089

Re: *Personalized User Model LLP v. Google Inc.*, C.A. No. 09-00525-JJF

Dear Counsel:

As indicated in the agreement being transmitted with this letter, Google has acquired SRI International's ownership rights in the patents-in-suit, as well as U.S. Patent 7,320,031.

Google seeks to amend its Answer to bring a counterclaim for a declaratory judgment against Personalized User Model LLP, a claim for breach of contract against Yochai Konig, and any other claims that may be necessary and appropriate to assert and give full effect to Google's ownership rights in these patents.

Please let us know by Friday if Plaintiff will consent to Google amending its Answer to assert these claims. As you represent Mr. Konig, and as he is a representative of PUM as indicated at the claim construction hearing, please also let us know by Friday if Mr. Konig will consent to

quinn emanuel urquhart & sullivan, llp

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being subject to personal jurisdiction in Delaware for purposes of this action. If Mr. Konig will not so consent, Google will move to dismiss for failure to join an indispensable party, and/or file an action against Mr. Konig in California and move to stay this case.

Please let me know if you have any questions.

Sincerely,

/s/

Eugene Novikov

EXHIBIT 4

From: Andrea P Roberts
Sent: Thursday, January 27, 2011 6:13 PM
To: Andrea P Roberts; Bennett, Jennifer D.
Cc: Google-PUM; Horwitz, Richard L.; Moore, David E.
Subject: RE: PUM v. Google

Jennifer,

As a follow up, I wanted to flag for you that we also added a laches defense.

Thanks,

Andrea

From: Andrea P Roberts
Sent: Thursday, January 27, 2011 5:45 PM
To: Bennett, Jennifer D.
Cc: Google-PUM; Horwitz, Richard L.; Moore, David E.
Subject: RE: PUM v. Google

Jennifer,

Attached is a draft of the amended answer for your review. There are a few cite holes to be filled in, but that should not affect your review. Please promptly let us know whether PUM will consent to the filing of the attached.

Thanks,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bennett, Jennifer D. [<mailto:jennifer.bennett@snrdenton.com>]
Sent: Thursday, January 20, 2011 7:28 PM
To: Eugene Novikov
Cc: Google-PUM
Subject: PUM v. Google

Gene-

Please see the attached correspondence.

Thanks,

Jennifer D. Bennett
Managing Associate
SNR Denton US LLP
D +1 650 798 0325
jennifer.bennett@snrdenton.com
snrdenton.com



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EXHIBIT 5

From: Andrea P Roberts
Sent: Thursday, February 03, 2011 5:55 PM
To: Bennett, Jennifer D.
Cc: Google-PUM; rhorwitz@Potteranderson.com; Moore, David E.
Subject: PUM v. Google

Jennifer,

I write regarding paragraph 6 of the September 29, 2010 Stipulated Amended Scheduling Order, which provides that no case dispositive motion may be filed early without leave of Court. Please let us know whether PUM and Mr. Konig will stipulate to Google filing a motion for summary judgment on patent ownership and standing issues prior to the date set forth in paragraph 6 for dispositive motions. As our amended pleading makes clear, there is no genuine issue of material fact as to the threshold issues of ownership and standing, making these issues appropriate for early resolution on summary judgment. Please let us know by Monday whether PUM and Mr. Konig agree so that we know whether to move forward with this motion.

Thanks,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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EXHIBIT 6

From: Bennett, Jennifer D. [jennifer.bennett@snrdenton.com]
Sent: Wednesday, February 23, 2011 9:55 AM
To: David Perlson
Cc: rhorwitz@Potteranderson.com; dmoore@potteranderson.com; Google-PUM
Subject: RE: Activity in Case 1:09-cv-00525-LPS Personalized User Model LLP v. Google Inc. Motion for Leave to File

David,

In answer to your email, the details supporting our position will be clearly set forth in our answering papers. Also, we will not consent to an abbreviated briefing schedule but we will endeavor to file our opposing brief and supporting papers as soon as possible.

Thanks,

Jennifer D. Bennett
Managing Associate
SNR Denton US LLP
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From: David Perlson [mailto:davidperlson@quinnemanuel.com]
Sent: Tuesday, February 22, 2011 3:54 PM
To: Bennett, Jennifer D.
Cc: Nelson, Mark C.; rhorwitz@Potteranderson.com; dmoore@potteranderson.com; Google-PUM
Subject: RE: Activity in Case 1:09-cv-00525-LPS Personalized User Model LLP v. Google Inc. Motion for Leave to File

Jennifer,

Can you clarify why you believe the summary judgment motion is “premature,” other than that is before the schedule set forth in the Case Management Order.

Further, even if PUM persists on opposing Google’s motion for leave, will PUM agree to expedite briefing on the issue? As you can imagine, Google would like to reach resolution of this issue as soon as possible and it seems there be no reason why PUM should not be able to oppose our brief motion for leave on short order.

Thanks,

David

From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Tuesday, February 22, 2011 3:44 PM
To: David Perlson

Cc: Nelson, Mark C.; rhorwitz@Potteranderson.com; dmoore@potteranderson.com; Google-PUM
Subject: RE: Activity in Case 1:09-cv-00525-LPS Personalized User Model LLP v. Google Inc. Motion for Leave to File

David,

To be clear, PUM's position is that your Motion for Summary Judgment is premature (and unfounded) and that such a dispositive motion should be made only in accordance with the schedule set forth in the Case Management Order. As a result, we will oppose your request for leave and will be submitting opposing papers.

Thanks,

Jennifer D. Bennett
Managing Associate
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From: David Perlson [mailto:davidperlson@quinnemanuel.com]
Sent: Tuesday, February 22, 2011 11:43 AM
To: Bennett, Jennifer D.
Cc: Nelson, Mark C.; rhorwitz@Potteranderson.com; dmoore@potteranderson.com; Google-PUM
Subject: FW: Activity in Case 1:09-cv-00525-LPS Personalized User Model LLP v. Google Inc. Motion for Leave to File

Jennifer, given today's hearing, I wanted to follow up on Google's motion for leave to determine whether it remains PUM's position that Google's Motion for Summary Judgment should not be briefed on the merits at this time. While PUM may oppose the relief sought in Google's Motion for Summary Judgment, that should not preclude it from briefing on the merits now. Please let us know.

Thanks,

David

From: ded_nefreply@ded.uscourts.gov [mailto:ded_nefreply@ded.uscourts.gov]
Sent: Monday, February 21, 2011 3:29 PM
To: ded_ecf@ded.uscourts.gov
Subject: Activity in Case 1:09-cv-00525-LPS Personalized User Model LLP v. Google Inc. Motion for Leave to File

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U.S. District Court

District of Delaware

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The following transaction was entered by Moore, David on 2/21/2011 at 6:29 PM EST and filed on 2/21/2011

Case Name: Personalized User Model LLP v. Google Inc.

Case Number: [1:09-cv-00525-LPS](#)

Filer: Google Inc.

Document Number: [196](#)

Docket Text:

SEALED MOTION for Leave to File [DEFENDANT AND COUNTERCLAIMANT GOOGLE INC.'S MOTION FOR LEAVE TO FILE ITS MOTION FOR SUMMARY JUDGMENT ON ITS BREACH OF CONTRACT COUNTERCLAIM, ITS DECLARATION OF OWNERSHIP COUNTERCLAIM, AND ITS AFFIRMATIVE DEFENSE OF LACK OF STANDING (Exs. A-C)] - filed by Google Inc.. (Moore, David)

1:09-cv-00525-LPS Notice has been electronically mailed to:

Andrea P. Roberts andreaproberts@quinnemanuel.com, annellebosio@quinnemanuel.com

Brian C. Howard brianhoward@quinnemanuel.com, amberburns@quinnemanuel.com

David A. Perlson davidperlson@quinnemanuel.com, calendar@quinnemanuel.com

David Ellis Moore dmoore@potteranderson.com, ntarantino@potteranderson.com, shamlin@potteranderson.com

Eugene Novikov eugenenovikov@quinnemanuel.com

Jeremy Alexander Tigan jtigan@mnat.com

Karen Jacobs Loudon kjlefilings@mnat.com

Richard L. Horwitz rhorwitz@potteranderson.com, iplitigation@potteranderson.com, lfernandes@potteranderson.com, mbaker@potteranderson.com, shamlin@potteranderson.com

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Brian C. Cannon

The following document(s) are associated with this transaction:

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764a4345c1b8c3b7359dd719ed14bd25dfe9bd96d09d0a8357b1c71cd1074]]



EXHIBIT 7

From: Bennett, Jennifer D. [jennifer.bennett@snrdenton.com]
Sent: Tuesday, February 01, 2011 12:53 PM
To: Andrea P Roberts; David Perlson
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: PUM v. Google: Final Amended Answer

Andrea,

I write in response to Google's request for consent to file an amended answer and counterclaims. PUM will not oppose Google's motion for leave to file an amended answer and counterclaims, subject to PUM's reservation of rights to oppose on the merits (including any motion to dismiss), provided (1) Google agrees to extend the period of time PUM has to answer or otherwise respond to such counterclaims from 20 days to 35 days; (2) in addition to the 35 interrogatories and 15 depositions allowed by the Scheduling Order, Google agrees PUM can serve an additional 5 interrogatories and may notice an additional 3 depositions related to the issues raised in Google's answer and counterclaims, and if necessary, Google will not oppose any request by PUM to extend the current fact discovery deadline to conduct discovery relating to these issues; and (3) Google will not initiate a separate lawsuit in California.

Thanks,

Jennifer D. Bennett
Managing Associate
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From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Monday, January 31, 2011 4:08 PM
To: David Perlson; Bennett, Jennifer D.
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: RE: PUM v. Google: Final Amended Answer

Jennifer,

Please see the attached answer with citations filled in. Also attached are Exhibits A-D. Due to the volume, the remainder of the exhibits will follow by separate email.

Regards,

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: David Perlson
Sent: Monday, January 31, 2011 10:35 AM
To: Bennett, Jennifer D.; Andrea P Roberts
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: RE: PUM v. Google: Final Amended Answer

Jennifer, we will provide the complaint with the citations filled in today.

As for laches, the reason it is being added now is the apparent lack of witness memory of relevant events and seemingly missing and/or unattainable documents that form the basis for the defense have come to light based on recent depositions and correspondence.

From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Monday, January 31, 2011 10:27 AM
To: Andrea P Roberts; David Perlson
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: PUM v. Google: Final Amended Answer

David and Andrea,

P.U.M. will need to see the "final" proposed amended complaint before P.U.M. can provide its consent.

Also, please provide Google's justification for seeking leave to amend to add a laches defense this late in discovery, as the two issues are completely unrelated.

Thanks,

From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Friday, January 28, 2011 1:27 PM
To: Bennett, Jennifer D.
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: RE: PUM v. Google

Jennifer,

Please see the attached redline comparison.

Thanks,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Friday, January 28, 2011 10:18 AM
To: Andrea P Roberts
Cc: Google-PUM; rhorwitz@Potteranderson.com; dmoore@potteranderson.com
Subject: Re: PUM v. Google

Andrea,

Can you please send me a redline version showing the differences between the original and amended answers?

Thanks,

Jennifer D. Bennett
Managing Associate
SNR Denton US LLP
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jennifer.bennett@snrdenton.com
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From: Andrea P Roberts <andraproberts@quinnemanuel.com>
To: Andrea P Roberts <andraproberts@quinnemanuel.com>; Bennett, Jennifer D.
Cc: Google-PUM <Google-PUM@quinnemanuel.com>; Horwitz, Richard L. <rhorwitz@Potteranderson.com>; Moore, David E. <dmoore@potteranderson.com>
Sent: Thu Jan 27 20:12:40 2011
Subject: RE: PUM v. Google

Jennifer,

As a follow up, I wanted to flag for you that we also added a laches defense.

Thanks,

Andrea

From: Andrea P Roberts
Sent: Thursday, January 27, 2011 5:45 PM
To: Bennett, Jennifer D.

Cc: Google-PUM; Horwitz, Richard L.; Moore, David E.
Subject: RE: PUM v. Google

Jennifer,

Attached is a draft of the amended answer for your review. There are a few cite holes to be filled in, but that should not affect your review. Please promptly let us know whether PUM will consent to the filing of the attached.

Thanks,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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Sent: Thursday, January 20, 2011 7:28 PM
To: Eugene Novikov
Cc: Google-PUM
Subject: PUM v. Google

Gene-

Please see the attached correspondence.

Thanks,

Jennifer D. Bennett
Managing Associate
SNR Denton US LLP
D +1 650 798 0325
jennifer.bennett@snrdenton.com
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