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April 25, 2011

The Honorable Leonard P. Stark
United States District Court
for the District of Delaware
844 N. King Street
Wilmington, DE 19801

VIA ELECTRONIC FILING

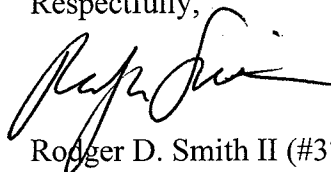
Re: *Personalized User Model, L.L.P. v. Google, Inc., C.A. No. 09-525 (LPS)*

Dear Judge Stark:

I am writing on behalf of PUM in response to Google's April 20, 2011 letter in which Google advises the Court that certain depositions have concluded (D.I. 250). Those depositions were just one of the reasons why Google's request for leave to file an early summary judgment motion is premature. As PUM discussed in its earlier briefing, there are many additional reasons why Google's request for leave to file an early summary judgment motion is improper (D.I. 215). Those reasons now also include the need for additional third party discovery, and possibly expert discovery, as a result of the recently concluded depositions referred to by Google in its letter to the Court.

PUM respectfully submits that Google's motion for leave to file an early summary judgment motion is still improper. Google's proposed summary judgment motion should be filed at the conclusion of fact and expert discovery, as the Court's Scheduling Order provides (D.I. 104).

Respectfully,



Rodger D. Smith II (#3778)

RDS/nlm

cc: Clerk of the Court (by hand)
All Counsel of Record (via e-filing and/or e-mail)

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