

EXHIBIT A

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT B

**THIS EXHIBIT HAS BEEN
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EXHIBIT C

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EXHIBIT D

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EXHIBIT E

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REDACTED IN ITS ENTIRETY**

EXHIBIT F

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT G



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June 1, 2011

VIA E-MAIL AND REGULAR MAIL

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP
555 Twin Dolphin Drive
5th Floor
Redwood Shores, CA 94065

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

Dear Andrea:

This letter responds to portions of your May 31, 2011 letter regarding the parties' meet and confer on various outstanding discovery issues. During the meet and confer PUM agreed to let Google know by today whether it would agree to produce communications relating to the scheduling of the 1/19/11 and 2/7/11 meetings, the subject matter discussed during those meetings, and PUM's preparation of its Fourth Supplemental Response to Interrogatory No. 1. As we explained during the meet and confer, we do not understand the Court's Order to require the production of these materials. Further, we do not agree with Google's "sword and shield" characterization of this issue. Per the Court's Order, Google was permitted to inquire as to what occurred during these meetings; and per the Court's Order PUM will produce Mr. Konig to discuss what occurred during these meetings. In PUM's view, no sword and shield issue remains. Rather, it seems that Google is being opportunistic -- attempting to use this issue as a wedge to obtain a waiver of uncertain breadth and scope. PUM, therefore, will not produce the documentation requested in your 5/18/11 letter regarding this topic.

Your letter also requested confirmation that all documents shown to Messrs. Twersky and Konig during the 1/19/11 and 2/7/11 meetings have been produced. They have. Additionally, per your request, PUM will identify the documents, if any, on its privilege log that relate to conception/reduction.

PUM also indicated it would inform Google by today whether it would supplement its Responses to Google's Interrogatory Nos. 17-24 to cure the so-called deficiency of incorporation by reference. While PUM disagrees that its responses are in any way deficient, and that its incorporation of portions of its Response to Google Interrogatory No. 11 by reference is in any way improper, rather than waste the Court's time on this issue PUM will provide the requested supplementation either via the suggested compromise or otherwise. PUM, however, does not want to have to supplement again once PUM obtains the additional technical information requested from Google (*i.e.*, the source code, the completed interrogatory responses, and/or additional testimony via the requested 30(b)(6) deposition). PUM,

SNR DENTON 

Andrea Pallios Roberts
June 1, 2011
Page 2

therefore, will provide a date for completing such supplementation after Google provides the requested information.

PUM will address the remainder of your May 31, 2011 letter via separate correspondence.

Very truly yours,

Christian E. Samay
Christian E. Samay

aen
Enclosure

EXHIBIT H

**Personalized User Model's Privilege Log
Personalized User Model LLC v. Google, Inc.**

PRIV #	From (Author)	To (Recipient)	Cc	Date	Description	Privilege Basis
PRIV 979	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		1/18/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 980	Yochai Konig	Jennifer Bennett, Esq.; Roy Twersky		1/18/2011	E-mail from client to attorney made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 981	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		1/18/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	
PRIV 982	Roy Twersky	Jennifer Bennett, Esq.	Yochai Konig	1/18/2011	E-mail from client to attorney made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 983	Yochai Konig	Marc Friedman, Esq.	Roy Twersky; Mark Nelson, Esq.; Jimmy Shin, Esq.; Jennifer Bennett, Esq.; Karen Jacobs Louden, Esq.	1/30/2011	E-mail from client to attorney made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 984	Marc Feledman, Esq.	Yochai Konig; Mark Nelson, Esq.	Jennifer Bennett, Esq.	1/31/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC

**Personalized User Model's Privilege Log
Personalized User Model LLC v. Google, Inc.**

PRIV #	From (Author)	To (Recipient)	Cc	Date	Description	Privilege Basis
PRIV 985	Jennifer Bennett, Esq.	Roy Twersky	Yochai Konig	2/6/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 986	Jennifer Bennett, Esq.	Yochai Konig	Roy Twersky; Yochai Konig	2/6/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 987	Jennifer Bennett, Esq.	Roy Twersky	Roy Twersky; Yochai Konig; Mark Nelson, Esq.	2/6/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 988	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 989	Jennifer Bennett, Esq.	Roy Twersky		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 990	Yochai Konig	Jennifer Bennett, Esq.; Roy Twersky		2/8/2011	E-mail from client to attorney made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 991	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC

**Personalized User Model's Privilege Log
Personalized User Model LLC v. Google, Inc.**

PRIV #	From (Author)	To (Recipient)	Cc	Date	Description	Privilege Basis
PRIV 992	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 993	Jennifer Bennett, Esq.	Roy Twersky		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 994	Roy Twersky	Mark Nelson, Esq.; Mark Friedman, Esq.; Jimmy Shin, Esq.; Jennifer Bennett, Esq.; Yochai Konig		2/8/2011	E-mail from client to attorney made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 995	Jennifer Bennett, Esq.	Roy Twersky; Yochai Konig		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC
PRIV 996	Jennifer Bennett, Esq.	Roy Twersky		2/8/2011	E-mail from attorney to client made in preparation and reflecting the substance of a confidential communication regarding ongoing litigation.	AC

EXHIBIT I

Andrea P Roberts


From: Larson, Matthew P. [matthew.larson@snrdenton.com]
Sent: Thursday, June 16, 2011 6:31 PM
To: Andrea P Roberts
Cc: Google-PUM; 'rhorwitz@potteranderson.com'; 'dmoore@potteranderson.com'; PUM
Subject: RE: PUM v. Google

Andrea,

Your initial May 18, 2011 letter did not request "all communications ... that relate to conception," rather, Google requested the production of "any written communications with Konig or Twersky regarding scheduling the January 19 and February 7 meetings, the subject matters discussed at those meetings, and PUM's preparation of its Fourth Supplemental Response to Interrogatory No. 1." The privilege log provided, therefore, reflects all written, privileged communications subsequent to the December inventor depositions that relate to the January 19 and February 7 meetings and preparation of P.U.M.'s Fourth Supplemental Response to Interrogatory No. 1. This is consistent with PUM's June 1, 2011 letter (refusing to produce "communications relating to the scheduling of the 1/19/11 and 2/7/11 meetings, the subject matter discussed during those meetings, and PUM's preparation of its Fourth Supplemental Response to Interrogatory No. 1") referenced in your June 10, 2011 e-mail and these are the written communications reflected in P.U.M.'s June 20, 2011 privilege log. Please feel free to contact Christian Samay with any questions.

Regards,
Matt

Matthew P. Larson
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From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Thursday, June 16, 2011 2:33 PM
To: Larson, Matthew P.; PUM
Cc: Google-PUM; 'rhorwitz@potteranderson.com'; 'dmoore@potteranderson.com'
Subject: PUM v. Google

Matt,

I write in response to your June 10, 2011 email below attaching PUM's log of privileged communications, which is attached hereto for your reference. Please confirm that this log reflects all communications subsequent to the December inventor depositions that relate to conception, the meetings with the inventors regarding same, and/or the changing of the interrogatory response and Mr. Twersky's testimony concerning conception, that have been withheld by PUM as privileged. (See A. Roberts 6/10/11 email; D. Perlson 6/9/11 email requesting same).

Thank you,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Larson, Matthew P. [<mailto:matthew.larson@snrdenton.com>]
Sent: Friday, June 10, 2011 5:46 PM
To: Andrea P Roberts
Cc: Google-PUM
Subject:

Dear Andrea:

P.U.M.'s log of all privileged communications withheld from production in response to the requests in your May 31, 2011 letter is attached.

Kind Regards,
Matt

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