

**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.,)	JURY TRIAL DEMANDED
)	
Defendant.)	
<hr style="width: 45%; margin-left: 0;"/>		
GOOGLE, INC.)	PUBLIC VERSION
)	
Counterclaimant,)	
)	
v.)	
)	
PERSONALIZED USER MODEL, LLP and)	
YOCHAI KONIG)	
)	
Counterdefendants.)	

**DECLARATION OF ANDREA PALLIOS ROBERTS IN SUPPORT OF
GOOGLE'S MOTION TO STAY THE PROCEEDINGS**

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Attorneys for Defendant Google Inc.

Dated: August 30, 2012
Public Version Dated: September 6, 2012

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Andrea Pallios Roberts states:

1. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP, attorneys for Defendant Google Inc.
2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff Personalized User Model L.L.P.'s Fifteenth Supplemental Responses to Defendant Google, Inc.'s First Set of Interrogatories (Nos. 9-11).
3. Attached hereto as Exhibit 2 is a true and correct copy of the reexamination transaction history US Patent No. 7,685,276 (reexamination control number 95/001,699), accessed on August 30, 2010, available on the Public PAIR website at <http://portal.uspto.gov/external/portal/pair>.
4. Attached hereto as Exhibit 3 is a true and correct copy of the reexamination transaction history US Patent No. 6,981,040 (reexamination control number 95/001,569), accessed on August 30, 2010, available on the Public PAIR website at <http://portal.uspto.gov/external/portal/pair>.
5. Attached hereto as Exhibit 4 is an excerpt of the deposition of Yochai Konig taken on January 26, 2012.
6. Attached hereto as Exhibit 5 is an excerpt of the deposition of Roy Twersky taken on January 26, 2012.
7. Attached hereto as Exhibit 6 is a true and correct copy of an email from Antonio Sistos to Jennifer Bennett, sent on July 10, 2012.
8. Attached hereto as Exhibit 7 is a true and correct copy of an email from Antonio Sistos to Jennifer Bennett, sent on July 10, 2012.

9. Attached hereto as Exhibit 8 is a true and correct copy of an email from Antonio Sistos to Jennifer Bennett, sent on July 20, 2012.
10. Attached hereto as Exhibit 9 is a true and correct copy of an email from Michael Kim to Jennifer Bennett, inter alia, sent on July 30, 2012.
11. Attached hereto as Exhibit 10 is a true and correct copy of an email from Michael Kim to Jennifer Bennett sent on August 3, 2012.
12. Attached hereto has Exhibit 11 is a true and correct copy of excerpts of the website found at http://www.uspto.gov/ip/boards/bpai/stats/receipts/fy2012_jul_e.jsp, accessed on August 30, 2012. The cited portions have been highlighted. According to the website, Technology Center 3900 is the Central Reexamination Unit. In July 2010, the BPAI reversed 3 Ex Parte Appeals from Technology Center 3900, of a total of 23 reviewed.
13. Attached hereto as Exhibit 12 is a true and correct copy of "Ex Parte Reexamination Filing Data – June 30, 2012", available for download at http://www.uspto.gov/patents/stats/Reexamination_Information.jsp
14. Attached hereto as Exhibit 13 is a true and correct copy of "Inter Partes Reexamination Filing Data – June 30, 2012", available for download at http://www.uspto.gov/patents/stats/Reexamination_Information.jsp
15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of Ten Years of Inter Partes Patent Reexamination Appeals: An Empirical View by Eric J. Rogers.
16. Attached hereto as Exhibit 15 is a true and correct copy of an email from Jennifer Bennett to me, sent on March 8, 2012.
17. Attached hereto as Exhibit 16 is a true and correct copy of a letter from Jennifer Bennett to me, sent on March 20, 2012.

18. Attached hereto as Exhibit 17 is a true and correct copy of a letter from Jennifer Bennett to Joshua Sohn, sent on April 1, 2012.

19. Attached hereto as Exhibit 18 is a true and correct copy of a letter from Jennifer Bennett to David Perlson sent on April 13, 2012.

20. Attached hereto as Exhibit 19 is a true and correct copy of a letter from Jennifer Bennett to David Perlson sent on June 12, 2012.

21. Attached hereto as Exhibit 20 is a true and correct copy of an email from Jennifer Bennett to David Perlson, inter alia, sent on June 14, 2012.

22. Attached hereto as Exhibit 21 is a true and correct copy of an email from Jennifer Bennett to David Perlson, inter alia, sent on July 2, 2012.

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

Executed in Redwood Shores, California on August 30, 2012.

Respectfully submitted,

/s/ Andrea Pallios Roberts
Andrea Pallios Roberts

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

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on September 6, 2012, 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 6, 2012, the attached document was Electronically Mailed to the following person(s):

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