

EXHIBIT 1

Bennett, Jennifer D.

From: Bennett, Jennifer D.
Sent: Thursday, March 08, 2012 2:58 PM
To: 'Andrea P Roberts'; PUM
Cc: Google-PUM; rhorwitz@potteranderson.com; dmoore@potteranderson.com
Subject: PUM v. Google

Andrea,

I write in response to Google's March 1, 2012 announcement changing Google's privacy policy. It is clear from the publicly available information on the new policy that Google is monitoring and using information it collects about its users and combining all of the collected information in one place to provide personalized search results and ads to the user, and is therefore, highly relevant to the current case. Please immediately supplement Google's document production and produce all documents relating to Google's new policy and the ways in which Google monitors, collects and combines data regarding user's interactions to provide search results and ads to its users.

Thanks,

EXHIBIT 2

March 20, 2012

BY E-MAIL

Andrea Roberts
Quinn Emanuel Urquhart & Sullivan LLP
555 Twin Dolphin Shores Drive, 5th Floor
Redwood Shores, CA 94065-2139

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

Dear Andrea:

I write to follow-up on my March 8, 2012 email regarding Google's new privacy policy and in response to your March 15, 2012 email regarding the same. As I stated in my email, the publicly available information regarding Google's new policy indicates Google is combining information from user's interactions across different Google services/products and using this combined data to personalize the user's experience. For example, Google states, "Second, the new policy reflects our efforts to create one beautifully simple, intuitive user experience across Google. It makes clear that, if you have a Google Account and are signed in, we may combine information you've provided from one service with information from other services. In short, we can treat you as a single user across all our products." See for example, <http://www.google.com/intl/en/policies/faq/>. If this is true, as the policy suggests, documents relating to how Google combines user's interactions from different Google services/products to provide personalized search results and/or personalized advertisements is highly relevant to the case. Under the Federal Rules, Google is under a continuous obligation to supplement discovery and its document production. See, e.g., *Thiokol Corp. v. Alliant Techsystems, Inc.*, No. 95-706-JJF, slip op. at 10-11 (D. Del. Nov. 13, 1996); *Coming Inc. v. SRU Biosystems, LLC*, 223 F.R.D. 191, 194 n.3 (D. Del. 2004). Google has not done so to date and has refused to do so with respect to the above-requested information. It would be a waste of the resources of the parties and the Court to bring a separate lawsuit on the same subject matter. Please provide dates and times when Google is available to meet and confer on this issue.

Sincerely,

Jennifer D. Bennett
Jennifer D. Bennett

EXHIBIT 3

April 1, 2012

BY E-MAIL

Joshua Sohn
Quinn Emanuel Urquhart & Sullivan LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

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

Dear Joshua:

I write in response to your March 27, 2012 letter regarding Google's new privacy policy. First, Google's refusal to supplement its document production because fact discovery is closed is misplaced. As I stated in my letter to Ms. Roberts, and as I am sure you know, under the Federal Rules of Civil Procedure, Google is under a continuous obligation to supplement its discovery responses, including its document production. *See, e.g., Thiokol Corp. v. Alliant Techsystems, Inc.*, No. 95-706-JJF, slip op. at 10-11 (D. Del. Nov. 13, 1996); *Corning Inc. v. SRU Biosystems, LLC*, 223 F.R.D. 191, 194 n.3 (D. Del. 2004).

Further, your letter confirms the relevance of Google's new privacy policy to the present case. Specifically, you state, "The changes to Google's privacy policy also make clear that Google can, for a given signed-in user, **combine information gathered in connection with one Google service and use that information with information from other Google services**. For the vast bulk of Google properties, this does not represent a change in Google privacy policy or how Google treats and deals with user data. The two notable exceptions to this relate to Web History (i.e., search history for signed-in users) and YouTube (i.e., Google's video sharing service that it acquired in 2007). Under the new policy, it is clear to users, including those of YouTube and Web History, that such cross-service sharing is permitted."

Google's change in its policy reflects Google's change to relevant aspects of the accused systems, (e.g., Web History in Google Search and You Tube). Clearly, any change in the way Google combines information with one service to use in other Google services is highly relevant to the case, including, but not limited to, relevant to claim elements from both the '040 and '276 Patents relating to transparently monitoring user interactions with data, monitoring multiple modes of interaction, updating user-specific data files, estimating parameters of learning machine based in part on data specific to the user.

If you still maintain that Google has no obligation to provide this information, please immediately provide dates and times when Google is available to meet and confer on this issue.

Sincerely,

Jennifer D. Bennett
Jennifer D. Bennett

EXHIBIT 4

April 13, 2012

BY E-MAIL

David Perlson
Quinn Emanuel Urquhart & Sullivan LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

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

Dear David:

I write to follow-up on our meet and confer today regarding documents relating to Google's new privacy policy. As I stated during our call, there are several statements in Google's new privacy policy which indicates Google made changes to its Search and YouTube systems. For example, Google explains "[t]he changes to Google's privacy policy also make clear that Google can, for a given signed-in user, **combine information gathered in connection with one Google service and use that information with information from other Google services**. For the vast bulk of Google properties, this does not represent a change in Google privacy policy or how Google treats and deals with user data. The two notable exceptions to this relate to Web History (i.e., search history for signed-in users) and YouTube (i.e., Google's video sharing service that it acquired in 2007). Under the new policy, it is clear to users, including those of YouTube and Web History, that such cross-service sharing is permitted."

PUM is specifically interested in documents relating to the following:

1. Whether any information tracked and/or collected about a user while using Search, for example, queries, clicks on results, clicks on ads, results or ad impressions, or any derived information (i.e., odp, link, or rephil categories associated with such actions) is used by Google in other systems, for example, to determine which ads to display to a user on YouTube, or which videos to recommend; and
2. Whether any information tracked and/or collected about a user while viewing videos in YouTube or clicking on ads in YouTube, or any derived information (i.e., the categories associated with the ads that are clicked by the user) is used by Google in other systems, for example, in Google Search, to determine which search results or ads to display to a user.

As I stated in previous correspondence, and again during our call today, any documents relating to whether Google's change in its policy reflects Google's change to relevant aspects of the accused systems, (e.g., Web History in Google Search and You Tube), are highly relevant to the case. Please confirm as soon as possible whether these changes were made to Google's systems, and if so, whether Google will produce documents relating to such changes.

Sincerely,

Jennifer D. Bennett
Jennifer D. Bennett

EXHIBIT 5

Bennett, Jennifer D.

From: Bennett, Jennifer D.
Sent: Tuesday, April 17, 2012 10:05 AM
To: Bennett, Jennifer D.; 'David Perlson'; 'Joshua Sohn'
Cc: 'Andrea P Roberts'; PUM; 'Google-PUM'; 'rhorwitz@potteranderson.com'; 'dmoore@potteranderson.com'; 'Karen Louden (klouden@mnat.com)'
Subject: RE: PUM v. Google

David,
I write to follow-up on the letter I sent Friday regarding changes to its privacy policy and/or systems. Please let me know when PUM will receive a response.
Thanks,

-----Original Message-----

From: Bennett, Jennifer D.
Sent: Friday, April 13, 2012 8:59 PM
To: 'David Perlson'; Joshua Sohn
Cc: Andrea P Roberts; PUM; Google-PUM; rhorwitz@potteranderson.com; dmoore@potteranderson.com; Karen Louden (klouden@mnat.com)
Subject: RE: PUM v. Google

David,
Please see the attached correspondence.
Thanks,

-----Original Message-----

From: David Perlson [mailto:davidperlson@quinnemanuel.com]
Sent: Wednesday, April 11, 2012 11:44 AM
To: Bennett, Jennifer D.; Joshua Sohn
Cc: Andrea P Roberts; PUM; Google-PUM; rhorwitz@potteranderson.com; dmoore@potteranderson.com; Karen Louden (klouden@mnat.com)
Subject: RE: PUM v. Google

Jennifer, how about 2 pacific Friday?

-----Original Message-----

From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Tuesday, April 10, 2012 2:42 PM
To: Joshua Sohn
Cc: Andrea P Roberts; PUM; Google-PUM; rhorwitz@potteranderson.com; dmoore@potteranderson.com; Karen Louden (klouden@mnat.com)
Subject: Re: PUM v. Google

Joshua,
Are you available Thursday between 12 and 1230 PT? Otherwise we are generally available on Friday. Please let me know what works for you.
Thanks,

Sent from my iPhone

On Apr 4, 2012, at 8:55 AM, "Joshua Sohn"
<Joshuasohn@quinnemanuel.com<mailto:Joshuasohn@quinnemanuel.com>> wrote:

Jennifer,

In response to your request for a meet-and-confer regarding the changes to Google's privacy policy, we propose Monday, April 9, at 11:00 a.m. PDT.

Thanks,

Joshua Sohn
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6415 Direct
415.875.6600 Main Office Number
415.875.6700 FAX

Joshuasohn@quinnemanuel.com<mailto:Joshuasohn@quinnemanuel.com>
www.quinnemanuel.com<http://www.quinnemanuel.com>

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From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Sunday, April 01, 2012 8:35 PM
To: Joshua Sohn; Andrea P Roberts; PUM
Cc: Google-PUM; 'rhorwitz@potteranderson.com<mailto:rhorwitz@potteranderson.com>'; 'dmoore@potteranderson.com<mailto:dmoore@potteranderson.com>'; Karen Louden (klouden@mnat.com<mailto:klouden@mnat.com>)
Subject: RE: PUM v. Google

Joshua,
Please see the attached correspondence,
Thanks,

Jennifer D. Bennett
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SNR Denton US LLP
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From: Joshua Sohn [<mailto:Joshuasohn@quinnemanuel.com>]
Sent: Tuesday, March 27, 2012 12:26 PM
To: Bennett, Jennifer D.; Andrea P Roberts; PUM
Cc: Google-PUM; 'rhorwitz@potteranderson.com<<mailto:rhorwitz@potteranderson.com>>'; 'dmoore@potteranderson.com<<mailto:dmoore@potteranderson.com>>'; Karen Louden (klouden@mnat.com<<mailto:klouden@mnat.com>>)
Subject: RE: PUM v. Google
Jennifer,

Please see the attached correspondence.

Sincerely,

Joshua Sohn
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6415 Direct
415.875.6600 Main Office Number
415.875.6700 FAX

Joshuasohn@quinnemanuel.com<<mailto:Joshuasohn@quinnemanuel.com>>

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From: Bennett, Jennifer D. [<mailto:jennifer.bennett@snrdenton.com>]

Sent: Tuesday, March 20, 2012 4:15 PM
To: Andrea P Roberts; PUM
Cc: Google-PUM; 'rhorwitz@potteranderson.com<mailto:rhorwitz@potteranderson.com>';
'dmoore@potteranderson.com<mailto:dmoore@potteranderson.com>'; Karen Louden
(klouden@mnat.com<mailto:klouden@mnat.com>)
Subject: RE: PUM v. Google

Andrea,

Please see the attached correspondence.

Thanks,

Jennifer D. Bennett
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From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]

Sent: Thursday, March 15, 2012 2:46 PM

To: Bennett, Jennifer D.; PUM

Cc: Google-PUM; 'rhorwitz@potteranderson.com<mailto:rhorwitz@potteranderson.com>';
'dmoore@potteranderson.com<mailto:dmoore@potteranderson.com>'

Subject: RE: PUM v. Google

Jennifer, putting aside for moment that discovery is closed, Google's March 1, 2012 announcement concerns the adoption of a consolidated and more consistent privacy policy across Google properties. We do not see any reason to collect and produce any additional documents, and do not intend to do so.

Regards,

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Thursday, March 08, 2012 2:58 PM
To: Andrea P Roberts; PUM
Cc: Google-PUM; rhorwitz@potteranderson.com<mailto:rhorwitz@potteranderson.com>;
dmoore@potteranderson.com<mailto:dmoore@potteranderson.com>
Subject: PUM v. Google

Andrea,

I write in response to Google's March 1, 2012 announcement changing Google's privacy policy. It is clear from the publicly available information on the new policy that Google is monitoring and using information it collects about its users and combining all of the collected information in one place to provide personalized search results and ads to the user, and is therefore, highly relevant to the current case. Please immediately supplement Google's document production and produce all documents relating to Google's new policy and the ways in which Google monitors, collects and combines data regarding user's interactions to provide search results and ads to its users.

Thanks,

Jennifer D. Bennett
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EXHIBIT 6
FULLY REDACTED

EXHIBIT 7
FULLY REDACTED

EXHIBIT 8

FULLY REDACTED