

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

PERSONALIZED USER MODEL, L.L.P.,)

Plaintiff,)

v.)

GOOGLE INC.,)

Defendant.)

GOOGLE, INC.)

Counterclaimant,)

v.)

PERSONALIZED USER MODEL, LLP and
YOCHAI KONIG)

Counterdefendants.)

C.A. No. 09-525-LPS

JURY TRIAL DEMANDED

PUBLIC VERSION

**DECLARATION OF ANDREA PALLIOS ROBERTS IN SUPPORT OF GOOGLE,
INC.'S MOTION FOR SUMMARY JUDGMENT OF NONINFRINGEMENT**

OF COUNSEL:

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

Charles K. Verhoeven

David A. Perlson

Joshua Lee Sohn

Antonio R. Sistos

Margaret Pirnir Kammerud

50 California St.

San Francisco, CA 94111

Richard L. Horwitz (#2246)

David E. Moore (#3983)

Bindu A. Palapura (#5370)

POTTER ANDERSON & CORROON LLP

Hercules Plaza, 6th Floor

1313 N. Market Street

Wilmington, DE 19801

Tel: (302) 984-6000

rhowitz@potteranderson.com

dmoore@potteranderson.com

bpalapura@potteranderson.com

Andrea Pallios Roberts
555 Twin Dolphin Drive, Suite 560
Redwood Shores, CA 94065

Attorneys for Defendant Google Inc.

Dated: December 6, 2012

PUBLIC VERSION

Dated: December 13, 2012

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I, Andrea Pallios Roberts, declare as follows:

1. I am an attorney in the law firm on Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google in this action. I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, could testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,981,040.

3. Attached as Exhibit B is a true and correct copy of U.S. Patent No. 7,685,276.

4. Attached as Exhibit C is a true and correct copy of cited excerpts of the Expert Witness Report of Michael J. Pazzani, served on April 6, 2012.

5. Attached as Exhibit D is a true and correct copy of cited excerpts of the deposition of Michael Pazzani, taken on November 17, 2012.

6. Attached as Exhibit E is a true and correct copy of cited excerpts of the deposition of Jaime Carbonell, taken on November 27, 2012.

7. Attached as Exhibit F is a true and correct copy of cited excerpts of the Supplemental Expert Witness Report of Michael J. Pazzani, served on August 10, 2012.

8. Attached as Exhibit G is a true and correct copy of [REDACTED] produced by Google on March 16, 2012, bearing document control numbers GGL-PUM00119136-137 and GGL-PUM00119152-153, in response to PUM's request that Google produce certain [REDACTED].

9. Attached as Exhibit H is a true and correct copy of cited excerpts of PUM's Appeal Brief Under 37 C.F.R. §41.67, filed with the Patent Trial and Appeal Board in the Reexamination of U.S. Patent No. 7,685,276, and dated November 19, 2012.

10. Attached as Exhibit I is a true and correct copy of U.S. Patent No. 7,320,031.

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

Executed this 6th day of December 2012, in Redwood Shores, CA.

A handwritten signature in cursive script that reads "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 December 13, 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 December 13, 2012, the attached document was Electronically Mailed to the following person(s):

Karen Jacobs Louden
Jeremy A. Tigan
Morris, Nichols, Arsht & Tunnell LLP
1201 North Market Street, 18th Fl.
Wilmington, DE 19899-1347
klouden@mnat.com
jtigan@mnat.com

Marc S. Friedman
SNR Denton US LLP
1221 Avenue of the Americas
New York, NY 10020-1089
marc.friedman@snrdenton.com

Jennifer D. Bennett
Matthew P. Larson
SNR Denton US LLP
1530 Page Mill Road, Ste. 200
Palo Alto, CA 94304-1125
jennifer.bennett@snrdenton.com
matthew.larson@snrdenton.com

Mark C. Nelson
Robert Needham
SNR Denton US LLP
2000 McKinney, Suite 1900
Dallas, TX 75201
mark.nelson@snrdenton.com
robert.needham@snrdenton.com

Christian E. Samay
SNR Denton US LLP
101 JFK Parkway
Short Hills, NJ 07078
christian.samay@snrdenton.com

/s/ David E. Moore

Richard L. Horwitz
David E. Moore
Bindu A. Palapura
POTTER ANDERSON & CORROON LLP
(302) 984-6000
rhowitz@potteranderson.com
dmoore@potteranderson.com
bpalapura@potteranderson.com