

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

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

Plaintiff, )

v. )

GOOGLE, INC., )

Defendant. )

C.A. No. 09-525 (LPS)

GOOGLE, INC. )

**PUBLIC VERSION**

Counterclaimant, )

v. )

PERSONALIZED USER MODEL, L.L.P. and )  
YOCHAI KONIG, )

Counterclaim-Defendants. )

**DECLARATION OF MICHAEL J. PAZZANI IN SUPPORT OF PLAINTIFF  
PERSONALIZED USER MODEL, L.L.P.'S ANSWERING BRIEF IN OPPOSITION  
TO GOOGLE'S MOTION FOR SUMMARY JUDGMENT REGARDING SRI AND IN  
SUPPORT OF PUM'S CROSS-MOTION FOR SUMMARY JUDGMENT**

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	)	
Counterclaimant,	)	
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I, Michael J. Pazzani, declare:

1. I am the Vice Chancellor for Research and Economic Development and a Professor of Computer Science & Engineering at the University of California, Riverside. I hold a Ph.D. in Computer Science, an M.S. in Computer Engineering, and a B.S. in Computer Engineering, and have been retained as an expert witness for Plaintiff Personalized User Model, L.L.P. (“P.U.M.”) in this action. I make this declaration in support of P.U.M.’s Answering Brief in Opposition to Google’s Motion for Summary Judgment Regarding SRI and in Support of P.U.M.’s Cross-Motion for Summary Judgment.

2. On April 10, 2012 I submitted an expert report in which I opined, *inter alia*, that the inventions in U.S. Patent Nos. 6,981,040 and 7,685,276 did not result from Dr. Yochai

Konig's work at SRI, nor were these inventions related to any other work SRI was doing or contemplated at the time of Dr. Konig's employment. This opinion appears at pages 296-301 of my April 10, 2012 report, which I understand was served on April 11, 2012, and a true and correct copy of these pages are attached hereto as Exhibit A. I hereby incorporate by reference and adopt all statements and opinions reflected in my report as if set forth fully herein.

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

Executed this 13 day of Jan, 2013, at Riverside, California.



Michael J. Pazzani

**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered participants.

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on January 14, 2013, upon the following individuals in the manner indicated:

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