

**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.	)	<b>PUBLIC VERSION</b>
	)	
Counterclaimant,	)	
	)	
v.	)	
	)	
PERSONALIZED USER MODEL, L.L.P. and	)	
YOCHAI KONIG,	)	
	)	
Counterclaim-Defendants.	)	

**DECLARATION OF JENNIFER D. BENNETT 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**

OF COUNSEL:

Marc S. Friedman  
SNR Denton US LLP  
1221 Avenue of the Americas  
New York, NY 10020-1089  
(212) 768-6700

Jennifer D. Bennett  
SNR Denton US LLP  
1530 Page Mill Road, Ste. 200  
Palo Alto, CA 94304-1125  
(650) 798-0300

MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
Karen Jacobs Loudon (#2881)  
Jeremy A. Tigan (#5239)  
1201 N. Market Street  
P.O. Box 1347  
Wilmington, DE 19899-1347  
(302) 658-9200  
klouden@mnat.com  
jtigan@mnat.com

*Attorneys for Personalized User Model, L.L.P.  
and Yochai Konig*

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I, Jennifer D. Bennett, declare:

1. I am an attorney duly licensed to practice in the State of California, admitted to practice *pro hac vice* before this Court, and an associate with the law firm of SNR Denton US LLP, counsel 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. Attached as Exhibit A is a true and correct copy of the cited excerpts of the deposition transcript from the December 12, 2010 deposition of Dr. Yochai Konig in this matter.
3. Attached as Exhibit B is a true and correct copy of the cited excerpts of the

deposition transcript from the April 14, 2012 deposition of Horacio Franco in this matter.

4. Attached as Exhibit C is a true and correct copy of the cited excerpts of the deposition transcript from the December 3, 2010 deposition of Roy Twersky in this matter.

5. Attached as Exhibit D is a true and correct copy of Dr. Yochai Konig's Employment Agreement with SRI International, which Google produced as GGL-PUM00111105.

6. Attached as Exhibit E is a true and correct copy of Personalized User Model's October 12, 2011 Responses to Google's Interrogatory No. 1.

7. Attached as Exhibit F is a true and correct copy of a May 1999 draft white paper titled "Providing Your Personal Web", which was produced by P.U.M. as PUM0091910.

8. Attached as Exhibit G is a true and correct copy of the cited excerpts of the deposition transcript from the May 4, 2011 deposition of Dr. Yochai Konig in this matter.

9. Attached as Exhibit H is a true and correct copy of the cited excerpts of the deposition transcript from the January 26, 2012 deposition of Dr. Yochai Konig in this matter.

10. Attached as Exhibit I is a true and correct copy of an October 16, 1999 document describing the early prototyping of Utopy, Inc.'s embodiment of the claimed invention of the patents-in-suit, which was produced by P.U.M. as PUM0092036.

11. Attached as Exhibit J is a true and correct copy of the cited excerpts of the deposition transcript from the May 5, 2011 deposition of Roy Twersky in this matter.

12. Attached as Exhibit K is a true and correct copy of the cited excerpts of the deposition transcript from the July 6, 2011 deposition of Dr. Andreas Stolcke in this matter.

13. Attached as Exhibit L is a true and correct copy of the cited excerpts of the deposition transcript from the August 15, 2011 deposition of Dr. Mustafa Kemal Sonmez in this matter.

14. Attached as Exhibit M are true and correct copies of the assignment agreements transferring rights to the patents-in-suit from Yochai Konig, Roy Twersky, and Michael Berthold to Utopy, Inc., from Utopy, Inc. to Levino Ltd., and from Levino Ltd. to Personalized User Model, LLP. These documents were produced in the litigation as LUMEN0000139, LUMEN0000611, and PUM0069236, respectively.

15. Attached as Exhibit N is a true and correct copy of an e-mail chain among employees of SRI International regarding a transaction with Google. This e-mail chain was produced by SRI International and was used as Exhibit 19 during the April 14, 2011 deposition of Douglas Bercow in this matter.

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

Executed this 14th day of January 2013, at San Francisco, California

/s/ Jennifer D. Bennett  
Jennifer D. Bennett

**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:

**BY E-MAIL**

Richard L. Horwitz  
David E. Moore  
POTTER ANDERSON & CORROON LLP  
1313 N. Market St., 6th Floor  
Wilmington, DE 19801

**BY E-MAIL**

Brian C. Cannon  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
555 Twin Dolphin Dr., 5th Floor  
Redwood Shores, CA 94065

Charles K. Verhoeven  
David A. Perlson  
Antonio R. Sistos  
Andrea Pallios Roberts  
Joshua Lee Sohn  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111

*/s/ Jeremy A. Tigan*

Jeremy A. Tigan (#5239)