

**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 ON NON-INFRINGEMENT**

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GOOGLE, INC.,	)	
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Counterclaimant,	)	
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YOCHAI KONIG,	)	
	)	
Counterclaim-Defendants.	)	

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PERSONALIZED USER MODEL, L.L.P.’S ANSWERING BRIEF IN OPPOSITION  
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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 for non-infringement.

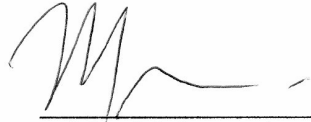
2. On April 10, 2012, I submitted an expert report in which I opined Google Search, Google Search Ads, Google Content Ads, and Google News infringed claims of U.S. Patent No. 6,981,040 and U.S. Patent No. 7,685,276. Attached as Exhibit A it a true and correct copy of my

report, which I understand was served on April 11, 2012, and selected exhibits attached thereto. I hereby incorporate by reference and adopt all statements and opinions reflected in my report as if set forth fully herein.

3. On August 10, 2012, I submitted a supplemental expert report in which I opined Google YouTube Video Recommendations and Google+ infringed claims of U.S. Patent No. 6,981,040. Attached as Exhibit B is a true and correct copy of my report, and selected exhibits attached thereto. 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.



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Michael J. Pazzani

**CERTIFICATE OF SERVICE**

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

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