

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**

**February 1, 2013**

**DECLARATION OF ANDREA PALLIOS ROBERTS  
IN SUPPORT OF GOOGLE INC.'S OPPOSITION TO PUM'S  
MOTION TO STRIKE DR. JORDAN'S LATE-DISCLOSED OPINIONS**

**VOLUME I**

**Exhibit A**

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 the expert report of Google's invalidity expert, Dr. Michael Jordan, dated April 11, 2012.

3. Attached as Exhibit B is a true and correct copy of excerpts from the deposition of Dr. Jordan, dated November 7, 2012.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the expert report of Plaintiff's validity expert, Dr. Jaime Carbonell, dated September 28, 2012.

5. I defended Dr. Jordan's deposition on November 7, 2012. At no point during any of the breaks in this deposition did I confer with Dr. Jordan regarding the substance of his testimony or this case.

Executed this 14th day of January 2013, in Redwood Shores, CA.



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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 February 1, 2013, 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 February 1, 2013, the attached document was Electronically Mailed to the following person(s):

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