

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 II**

**Exhibit B-C**

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.

6. 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.

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

8. 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.

9. 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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