

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.	)	
	)	
Counterclaimant,	)	
	)	
v.	)	
	)	
PERSONALIZED USER MODEL, L.L.P. and	)	
YOCHAI KONIG,	)	
	)	
Counterclaim-Defendants.	)	

**DECLARATION OF JAIME G. CARBONELL  
IN SUPPORT OF PLAINTIFF PERSONALIZED USER MODEL, L.L.P.’S  
REPLY BRIEF IN SUPPORT OF ITS MOTION TO STRIKE  
DR. JORDAN’S LATE DISCLOSED OPINIONS**

I, Jaime G. Carbonell, declare:

1. I submit this Declaration in Support of Plaintiff Personalized User Model, L.L.P.’s (“PUM”) Reply Brief in Support of Its Motion to Strike Dr. Jordan’s Late Disclosed Opinions.

2. I have been retained by counsel for PUM to respond to the Report of Defendant’s Expert Michael I Jordan, Ph.D., concerning invalidity of Claims 1, 11, 22, 32 and 34 of U.S. Patent No. 6,981,040 and Claims 1, 3, 5, 6, 7, 21 and 22 of U.S. Patent No. 7,685,276 (“Jordan Report”), and to respond where appropriate.

3. During Dr. Jordan's deposition on November 7, 2012, I learned for the first time that in Dr. Jordan's view Exhibit 3 attached to the Jordan Report implicitly referred to hundreds if not thousands of new combinations of prior art to show obviousness. Hence, I did not specifically rebut nor could I have rebutted each of these new combinations in my Rebuttal Report served on October 3, 2012.

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

Executed this 8<sup>th</sup> day of February 2013, at Pittsburgh, Pennsylvania.

A handwritten signature in black ink, reading "Jaime G. Carbonell". The signature is written in a cursive style with a long horizontal flourish at the end.

Jaime G. Carbonell

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 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 February 8, 2013, upon the following individuals in the manner indicated:

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*/s/ Jeremy A. Tigan*

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Jeremy A. Tigan (#5239)