

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.	)	

**PUM’S OBJECTION TO GOOGLE’S SO-CALLED “ERRATA” TO  
ITS DECLARATION IN SUPPORT OF GOOGLE’S  
MOTION FOR SUMMARY JUDGMENT OF INVALIDITY**

Plaintiff Personalized User Model LLC (“PUM”) objects to the so-called “Errata” filed by Google, Inc. (“Google”) on May 1, 2013 (D.I. 510), months after the filing of its summary judgment motion. That “Errata” is accompanied by a Declaration which purports to submit two prior art publications not previously of record. Contrary to Google’s assertions, the “Errata” does not correct an error, but rather seeks to supplement the summary judgment record without leave of court. Neither of these publications are described or discussed in the briefing on the referenced Motion for Summary Judgment of Invalidity. PUM accordingly did not have an opportunity to address them in its answering brief. Google’s attempt to supplement the summary judgment record in the guise of submitting an “Errata” is improper and should be rejected.

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May 7, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 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 May 7, 2013, upon the following individuals in the manner indicated:

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