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January 17, 2014

The Honorable Leonard P. Stark   **BY E-FILING**
United States District Court
   for the District of Delaware
844 North King Street
Wilmington, DE 19801

              Re: *Personalized User Model, L.L.P. v. Google, Inc.*
                       C.A. No. 09-525 (LPS)

Dear Judge Stark:

        Pursuant to the Court's direction, PUM writes to request a discovery dispute conference because the parties have been unable to resolve a dispute concerning Google's reduction of prior art references, both in terms of timing and the number of obviousness combinations on which Google may rely. The parties also have related disputes concerning pretrial order exchanges. PUM contends that it is only required to initially provide its portions of the Pretrial Order that relate to "plaintiff's case" under the local rule, and contends that it should not have to provide its sections on issues relating to "defendant's case" until after Google has provided those disclosures under the local rule, particularly where Google has not disclosed the references on which it will rely. Google disagrees. Although we conferred with Google in an attempt to submit a joint request, as instructed by the Court, we were unable to agree in a timely way on a non-argumentative submission.

        PUM requests a discovery dispute teleconference at the Court's earliest convenience because opening sections of the Pretrial Order are due on January 20, 2014, and rebuttal sections are due on February 5, 2014. As the Court is aware, trial is scheduled to begin on March 10, 2014.

                                              Respectfully,

                                              /s/ Karen Jacobs

                                              Karen Jacobs (#2881)

cc: Clerk of the Court (by hand)
        All Counsel of Record (by e-mail)