

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 DAUBERT MOTION TO EXCLUDE PORTIONS OF
DR. EDWARD FOX’S NON-INFRINGEMENT REPORT
FOR FAILURE TO APPLY THE COURT’S CLAIM CONSTRUCTION**

Plaintiff Personalized User Model, L.L.P. (“PUM”) respectfully moves this Court to exclude portions of Dr. Fox’s Non-Infringement Report for failure to apply the Court’s claim construction. The support for PUM’s Motion is set forth in PUM’s Opening Brief and supporting declaration, filed herewith.

/s/ Jeremy A. Tigan

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January 21, 2014
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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2014, 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 January 21, 2014, upon the following individuals in the manner indicated:

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