

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,)	REDACTED -- PUBLIC VERSION
v.)	
)	
PERSONALIZED USER MODEL, L.L.P. and)	
YOCHAI KONIG,)	
)	
Counterclaim-Defendants.)	

**DECLARATION OF JENNIFER D. BENNETT IN SUPPORT
OF PUM'S MOTION IN LIMINE TO PRECLUDE GOOGLE FROM
REFERRING TO RECENT CHANGES IN THE ACCUSED TECHNOLOGY**

Original Filing Date: March 2, 2014
Redacted Filing Date: March 10, 2014

I, Jennifer D. Bennett, declare:

1. I am an attorney duly licensed to practice in the State of California, admitted to practice pro hac vice before this Court, and an associate with the law firm of Dentons US LLP, counsel for Plaintiff Personalized User Model, L.L.P. (“PUM”) in this action. I make this declaration in support of in PUM’s Motion in Limine to Preclude Google from Referring to Recent Changes in the Accused Technology.

2. Attached as Exhibit 1 is a true and correct copy of an email from Jennifer Bennett, counsel for PUM, to Andrea Roberts, counsel for Google, dated March 8, 2012.

3. Attached as Exhibit 2 is a true and correct copy of a letter from Jennifer Bennett, counsel for PUM, to Andrea Roberts, counsel for Google, dated March 20, 2012.

4. Attached as Exhibit 3 is a true and correct copy of a letter from Jennifer Bennett, counsel for PUM, to Joshua Sohn, counsel for Google, dated April 1, 2012.

5. Attached as Exhibit 4 is a true and correct copy of a letter from Jennifer Bennett, counsel for PUM, to David Perlson, counsel for Google, dated April 13, 2012.

6. Attached as Exhibit 5 is a true and correct copy of an email string between Jennifer Bennett, counsel for PUM, and David Perlson, counsel for Google, dated May 2, 2012.

8. Attached as Exhibit 6 is a true and correct copy of a letter from Jennifer Bennett, counsel for PUM, to David Perlson, counsel for Google, dated June 12, 2012.

9. Attached as Exhibit 7 is a true and correct copy of an email string between Jennifer Bennett, counsel for PUM, and David Perlson, counsel for Google, dated July 26, 2012.

10. Attached as Exhibit 8 is a true and correct copy of an email string between Jennifer Bennett, counsel for PUM, and Antonio Sistos, counsel for Google, dated August 7, 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 1st day of March 2014, at Alameda, California

/s/ Jennifer D. Bennett

Jennifer D. Bennett

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EXHIBIT 1
FULLY REDACTED

EXHIBIT 2
FULLY REDACTED

EXHIBIT 3
FULLY REDACTED

EXHIBIT 4
FULLY REDACTED

EXHIBIT 5
FULLY REDACTED

EXHIBIT 6
FULLY REDACTED

EXHIBIT 7
FULLY REDACTED

EXHIBIT 8
FULLY REDACTED