


EXHIBIT A

 PEARL COHEN ZEDEK LATZER LLP

January 22, 2008

Direct Dial: (646) 878-0808
E-mail: GuyY@pczlaw.com

via Courier

Kent Walker, Esq.
Vice President & General Counsel
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: US Patents No. 6,981,040 and 7,320,031

Dear Mr. Walker:

We have been retained by Personalized User Model (P.U.M.) LLP to sell, license or otherwise monetize US Patents No. 6,981,040 (the " '040 Patent") and 7,320,031 (the " '031 Patent").

The patents, entitled Automatic, Personalized Online Information and Product Services, relate to personalized information services, including personalized search and personalized advertising results, on the Internet. The '040 Patent discloses:

A method for providing automatic, personalized information services to a computer user includes the following steps: transparently monitoring user interactions with data during normal use of the computer; updating user-specific data files including a set of user-related documents; estimating parameters of a learning machine that define a User Model specific to the user, using the user-specific data files; analyzing a document to identify its properties; estimating the probability that the user is interested in the document by applying the document properties to the parameters of the User Model; and providing personalized services based on the estimated probability. . . (Abstract)

As you can see from the above (and as you will surely see from the '040 and '031 Patent claims), these patents are highly relevant to Google's core strategic products relating to personalized search, news, advertising and other personalization services, particularly iGoogle and associated services.

Google has recognized the strategic importance of personalized search. As Marissa Meyer, Google's Vice President, Search Products & User Experience stated, "[w]e believe that the search engines of the future will be personalized and that it will offer users better results." Accordingly, as Google announced on February 2, 2007, "[w]e're constantly trying to improve the quality of your search results. One of the ways we're tackling this is by personalizing your search experience. . . Today, we're taking another step toward making personalization more available to you by combining these two into a single signed-in experience. Now, when you're signed in, you'll have access to a personalized Google—one that combines personalized search results and a personalized homepage."



PEARL COHEN ZEDEK LATZER LLP

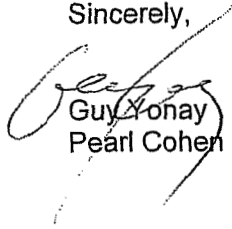
Mr. Kent Walker
January 22, 2008

Page 2 of 2

We also believe that Google's strategic interests converge with the '040 and '031 Patents based on a number of Google's currently pending US patent applications, including US Patent Publication No. 2005/0071328, which has been rejected by the USPTO as anticipated by the '040 Patent.

Please notify me of Google's position on this matter within two weeks of the date of this letter, as the assignee is currently weighing its options with respect to the patents.

Sincerely,



Guy Yonay
Pearl Cohen Zedek Latzer LLP

Attachments:

US Patent No. 6,981,040
US Patent No. 7,320,031

EXHIBIT B

 PEARL COHEN ZEDEK LATZER LLP

February 15, 2008

Direct Dial: (646) 878-0808

E-mail: GuyY@pczlaw.com

Via Federal Express

Kent Walker, Esq.
Vice President & General Counsel
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Re: US Patents No. 6,981,040 and 7,320,031

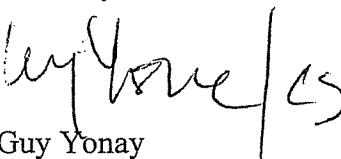
Dear Mr. Walker:

I have not received a response to my letter of January 22, 2008.

Please let me know whether Google is interested in acquiring or otherwise licensing Personalized User Model (P.U.M.) LLP's US Patents No. 6,981,040 (the "040 Patent") and 7,320,031 (the "031 Patent").

Please notify me of Google's position on this matter within one week of the date of this letter, as the assignee is currently weighing its options with respect to the patents.

Sincerely,


Guy Yonay

Attachments:

Letter of January 22, 2008
US Patent No. 6,981,040
US Patent No. 7,320,031

PUM v. Google
Del. 09-525-LPS

PTX1447

EXHIBIT C

02:24:45 1

IN THE UNITED STATES DISTRICT COURT

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IN AND FOR THE DISTRICT OF DELAWARE

3

PERSONALIZED USER MODEL, L.L.P.,

- - -

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Plaintiff,

: CIVIL ACTION

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v.

:

:

6

GOOGLE, INC.,

:

:

:

7

Defendant.

: NO. 09-525-LPS

8

- - -

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Wilmington, Delaware

Wednesday, February 26, 2014

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Pretrial Conference

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- - -

12

BEFORE: HONORABLE **LEONARD P. STARK**, U.S.D.C.J.

13

- - -

14

APPEARANCES:

15

MORRIS NICHOLS ARSHT & TUNNELL, LLP

16

BY: KAREN JACOBS, ESQ.,
REGINA S.E. MURPHY, ESQ., and
JEREMY A. TIGAN, ESQ.

17

and

18

SNR DENTON, LLP

19

BY: MARK C. NELSON, ESQ., and
RICHARD D. SALGADO, ESQ.
(Dallas, Texas)

20

21

and

22

SNR DENTON, LLP

23

BY: MARC S. FRIEDMAN, ESQ.
(New York, New York)

24

and

25

Brian P. Gaffigan
Registered Merit Reporter

1 APPEARANCES: (Continued)

2 SNR DENTON, LLP
3 BY: JENNIFER D. BENNETT, ESQ.
4 (Palo Alto, California)

5 and

6 SNR DENTON, LLP
7 BY: ANDREW M. GRODIN, ESQ.
8 (Short Hills, New Jersey)

9 Counsel for Personalized User Model, LLP

10 POTTER ANDERSON & CORROON, LLP
11 BY: RICHARD L. HORWITZ, ESQ.

12 and

13 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
14 BY: CHARLES K. VERHOEVEN, ESQ., and
15 DAVID A. PERLSON, ESQ.
16 And
17 ANTONIO R. SISTOS, ESQ.
18 (San Francisco, California)

19 and

20 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
21 BY: JOSHUA LEE SOHN, ESQ.
22 (Washington, District of Columbia)

23 and

24 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
25 BY: ANDREA PALLIOS ROBERTS, ESQ.
(Redwood Shores, California)

Counsel for Google, Inc.

1 we prepared. We showed it to counsel for PUM. I think
2 there is some language that they may say, you know, could be
3 have written a little differently. But I think we all agree
4 that these are items that are live to discuss with you.
5 Obviously, we can discuss them in whatever order.

6 THE COURT: Right. I'll be happy to take a look
7 at it.

8 MR. HORWITZ: Thank you.

9 MS. JACOBS: Your Honor.

10 THE COURT: Yes.

11 MS. JACOBS: We have no objection to the list,
12 per se. As Mr. Horwitz said, we don't feel like -- it may
13 be missing a few things but from our perspective, and, of
14 course, subject to what Your Honor had in mind in terms of
15 what you wanted to hear in the order, we would prefer not to
16 follow that order and instead to focus on -- first of all,
17 we think some of the issues really are, several of them are
18 clumped together under a single rubric and that the order
19 that is there may not necessarily reflect the importance to
20 the are parties for argument. So.

21 THE COURT: Okay. Well, I have only just had a
22 chance to glance at the agenda. I appreciate the effort.
23 Part of the reason I had to delay things by a half hour
24 getting started today is there is just an enormous amount
25 that you all still have in dispute which I think has been

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2 P R O C E E D I N G S

3 (REPORTER'S NOTE: The following pretrial
4 conference was held in open court, beginning at 2:28 p.m.)

5 THE COURT: Good morning, everyone.

6 (The attorneys respond, "Good morning, Your
7 Honor.")

8 THE COURT: I'll have you put your appearances
9 on the record for us, please.

10 MS. JACOBS: Good afternoon, Your Honor. For
11 plaintiff Personalized User Model, Karen Jacobs from Morris
12 Nichols. And at counsel table, we have Jennifer Bennett,
13 Mark Nelson and Marc Friedman of Dentons. And in the row
14 behind, Regina Murphy and Jeremy Tigan from Morris Nichols;
15 and Richard Salgado and Andrew Grodin also from Dentons U.S.

16 THE COURT: Okay. Welcome to all of you.

17 MR. HORWITZ: Good afternoon, Your Honor.

18 THE COURT: Good afternoon.

19 MR. HORWITZ: Rich Horwitz from Potter Anderson
20 on behalf of Google. With me today at counsel table, all
21 from Quinn Emanuel: Charles Verhoeven, David Perlson, John
22 Sohn, and Andrea Roberts. And John LaBarre, inside counsel
23 from Google is here as well.

24 THE COURT: Okay. Welcome.

25 MR. HORWITZ: Your Honor, I have an agenda that

1 characteristic of the case. But we will try to get through
2 all of it. If we don't, then we'll have another pretrial
3 conference sometime between now and trial.

4 But my plan is to briefly hear argument on the
5 two Daubert motions first, then briefly hear argument on the
6 motions in limine, all which looks to be consistent actually
7 with what Mr. Horwitz has proposed. Then we'll go over this
8 very, very long list of miscellaneous issues, probably in
9 the order that you put them in the pretrial order. But
10 perhaps we'll find a way to move for efficiently through
11 them. Then once we get through all that, we'll go through
12 any other issues that are in the pretrial order. And after
13 we're done with all of that, I'll see if there are other
14 issues either on Mr. Horwitz's list or otherwise, and
15 hopefully we will all be out of here sometime tonight.

16 So with that, let's start with just some brief
17 argument on -- and first, what does the plaintiff want me to
18 call you? Is it Poom (phonetic)? Is it P-U-M? What is it?

19 MR. NELSON: P-U-M or Personalized User Model,
20 Your Honor.

21 THE COURT: I will try to do P-U-M in my mind.
22 It's been Poom (phonetic) but I will try to do P-U-M.

23 So let's start with PUM's Daubert motion to
24 exclude portions of Dr. Fox's noninfringement testimony.
25 We'll just hear brief argument on that.

1 MR. NELSON: I don't believe we do, Your Honor.

2 THE COURT: I don't think you have. It's too
3 late for you to disclose that.

4 What about, did you have some other reason for
5 these letters or the speech to be relevant?

6 MR. NELSON: Yeah. The letters are relevant
7 because Google is going to presumably get up and say they're
8 a company that respects intellectual property, that they
9 take patent threats seriously. And the jury is going to
10 know why we're here and why we got here. And we certainly
11 should have the opportunity to tell the jury how we got here
12 and counter that story that they're likely to tell: That
13 they're such a great company and they respect intellectual
14 property. It's background information that is important for
15 the jury to know how we got here.

16 THE COURT: All right. And the '040 patent
17 being cited, how is that relevant?

18 MR. NELSON: The '040 patent being cited is
19 relevant to obviousness or lack thereof. Their
20 characterization of the Konig reference is sort of this
21 minor part of this. Well, that is fine. That is their
22 characterization, that is not ours.

23 Google tried for many years to develop
24 personalized search. As you will hear about in the next
25 motion, they bought a company called Kaltix. Kaltix then

1 somehow relevant, you look at the prejudice involved. And
2 we all know, and it's the only reason they want it in there,
3 is that when the jury sees these letters, that they're going
4 to think something nefarious has gone on. That is why
5 bifurcation is done and that it was why it was done in this
6 case. And if you let that in, it all goes away.

7 THE COURT: All right. Let's move on to your
8 motion in limine. Is that you?

9 MR. PERLSON: I think so.

10 THE COURT: Okay. That's the Kaltix revenues
11 and the acquisition of Kaltix.

12 MR. PERLSON: So first with this publicly.
13 There are two things that we're seeking to exclude sort of
14 relatedly, one which is this publicly available information
15 regarding revenue and the second is the information
16 regarding this Kaltix transaction.

17 First, the publicly available information, I
18 think it's like this press release that talks about Google's
19 like fourth quarter results; talks about, you know, all the
20 billions of dollars Google is making. It doesn't mention
21 personalization at all. It just, it really has no -- it
22 doesn't show anything other than Google makes a lot of
23 money.

24 THE COURT: Isn't there a reduced risk of
25 prejudice because we're not doing damages?

1 worked on it. The very product at issue are the Kaltix
2 Twiddler. That Google was late to the game in coming to
3 this, filed a patent application on it. The patent
4 application gets rejected by the patent-in-suit here. That
5 is very relevant as a secondary consideration to
6 nonobviousness. That they tried and failed, long-felt need,
7 Patent Office recognition. And I think we have said in the
8 briefing we're not going to allege that they copied it
9 unless some evidence comes out that we don't have, that we
10 don't know about thus far.

11 THE COURT: All right. Thank you. Let me give
12 Google a chance to respond.

13 I think my main question is are you going to get
14 up and say how wonderful Google is and it always respects
15 patents right, et cetera, et cetera? If so, doesn't that
16 open up the door to the background here?

17 MR. PERLSON: Well, I don't think that the fact
18 that Google says that it respects patent rights opens the
19 door. Those were just a letter offering to license the
20 patent. I mean we don't have -- we say we don't infringe,
21 and that is the reason why we respect intellectual property.
22 What we're going to tell the jury is that we respect
23 intellectual property and we don't infringe this patent.
24 That doesn't open the door to this evidence.

25 And, again, 403 looks at the -- even if it was

1 MR. PERLSON: No. Because that's the whole
2 thing is that when the jury sees a big number, it affects
3 everything. And they're going to think, they're going to
4 know down the road there is going to be damages here.
5 Someone is seeking a remedy for something. And they're
6 going to think, well, if they find infringement, what is the
7 big deal. There are billions of dollars at issue here.
8 That is why they want it in.

9 Now, we talk about relevance of it. They say
10 it's relevant because there is some nexus between these
11 revenues and what they have accused here, but there is zero,
12 absolutely zero evidence of a nexus.

13 Dr. Carbonell, who is I guess the only person
14 who they would have to make this link, said -- I asked him
15 at his deposition. I said.

16 "Question: So you have no way of knowing, sir,
17 what Google is doing that contributes to the success of its
18 products that may infringe the patents that plaintiff is
19 pointing to or all the other things that Google is doing
20 that plaintiff didn't accuse?

21 "Answer: I have not done an analysis of what
22 Google is doing with respect to personalization or with
23 respect to other improvements to doing search."

24 THE COURT: Didn't we already say there was some
25 evidence to which nexus can be found?

EXHIBIT D

02:24:45 1

IN THE UNITED STATES DISTRICT COURT

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IN AND FOR THE DISTRICT OF DELAWARE

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- - -

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PERSONALIZED USER MODEL, L.L.P., :

CIVIL ACTION

5

Plaintiff, :

v

6

GOOGLE, INC., :

7

Defendant. :

8

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GOOGLE, INC., :

Counterclaimant, :

10

v

11

PERSONALIZED USER MODEL, L.L.P., :

and YOCHAI KONIG, :

12

Counterclaim-Defendants. :

NO. 09-525-LPS

13

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Wilmington, Delaware
Thursday, March 13, 2014
Jury Trial - Volume D

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BEFORE: HONORABLE **LEONARD P. STARK**, U.S.D.C.J.

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- - -

19

APPEARANCES:

20

MORRIS NICHOLS ARSHT & TUNNELL, LLP

21

BY: KAREN JACOBS, ESQ.,

22

REGINA S.E. MURPHY, ESQ., and

JEREMY A. TIGAN, ESQ.

23

and

24

Valerie Gunning
Official Court Reporter

Brian P. Gaffigan
Official Court Reporter

25

Alferness - direct

- 1 MR. VERHOEVEN: Thank you.
- 2 DIRECT EXAMINATION
- 3 BY MR. VERHOEVEN:
- 4 Q. Good afternoon, Mr. Alferness.
- 5 A. **Good afternoon.**
- 6 Q. Let me ask you a few questions about your background
- 7 before we get into Google. Where did you grow up?
- 8 A. **I grew up in Holmdel, New Jersey.**
- 9 Q. Did you go to college?
- 10 A. **I did, yes. I did my undergraduate work at Cornell**
- 11 **University in Ithaca, New York, and then I spent some time**
- 12 **at graduate school at Cal Tech in Pasadena, California.**
- 13 Q. Where do you work?
- 14 A. **I work at Google.**
- 15 Q. What is your current role at Google, sir?
- 16 A. **I'm a director of product management at Google.**
- 17 Q. Are you married?
- 18 A. **I am, yes.**
- 19 Q. Do you have kids?
- 20 A. **We have two children. We have a son who is six years**
- 21 **old and our daughter is three.**
- 22 Q. Going back to your job, just summarize for the jury
- 23 what you do in your role at Google?
- 24 A. **Yes. I sure can. As a director of product**
- 25 **management, it's my responsibility to lay out the strategy**

Alferness - direct

- 1 **for our products, to understand what the features are that**
- 2 **we're going to develop, you know, to put those together in a**
- 3 **timeline.**
- 4 **And then I would say most importantly, it's**
- 5 **my responsibility to not only look after the products, but**
- 6 **the business as well, to make sure that the business is**
- 7 **healthy and growing.**
- 8 Q. How did your position fit within the hierarchy at
- 9 Google?
- 10 A. **I'd say it's a rather senior position. One way to**
- 11 **think about it is we have numeric associations with our**
- 12 **various levels at Google. One is the most junior and then**
- 13 **ten is vice president, essentially the most senior. I'm**
- 14 **currently a level nine or a senior director.**
- 15 Q. Mr. Alferness, I have to say you look pretty young
- 16 for a senior executive.
- 17 A. **I'm actually 39, 40 years old, and from a Silicon**
- 18 **Valley or tech perspective, that's, that's pretty old. If**
- 19 **you think about a lot of the folks, Mark Zuckerberg**
- 20 **Facebook, I think, for example, is in his early thirties.**
- 21 Q. Okay. Do people report to you in your position at
- 22 Google?
- 23 A. **Oh, absolutely. I have about five direct reports and**
- 24 **then a broader team of about nine product managers who roll**
- 25 **up through those direct reports. And as a director of**

Alferness - direct

- 1 **product management, it's not just my responsibility to lead**
- 2 **my direct reports and those product managers forward, but to**
- 3 **manage a broader team of engineers, marketing folks, sales,**
- 4 **et cetera.**
- 5 Q. How long have you been working at Google?
- 6 A. **I've been at Google almost ten years. In October of**
- 7 **this year it will be ten years.**
- 8 Q. Could you walk the jury briefly through a summary of
- 9 the various positions you have had since you joined the
- 10 company, please?
- 11 A. **Sure thing. Sure thing. When I started in late**
- 12 **2004, I joined a portion of the company called the Partners**
- 13 **Solutions Organization. My job in that role was to help our**
- 14 **large partners, America Online specifically, to utilize our**
- 15 **syndicated ads products, to help them make sure that those**
- 16 **products were working well, and that they continued to, you**
- 17 **know, make the revenue that they were supposed to through**
- 18 **those products.**
- 19 After about a year-and-a-half of time in that
- 20 role, I switched over to the product management
- 21 organization, where I took ownership of the syndicated ads
- 22 products that are across all of our different partners.
- 23 After doing that for about a year-and-a-half, I
- 24 grew that role into, you know, still being a product
- 25 manager, but into a broader Search Ads role where I took

Alferness - direct

- 1 ownership of a large portion of our Search Ads, products,
- 2 technologies, businesses, continuing to own those syndicated
- 3 ads products.
- 4 I worked in the Search Ads teams owning the vast
- 5 majority of what the Search Ads team does for about five to
- 6 six years. The last two years I've been focused on our
- 7 Mobile Display Ads products.
- 8 Q. How many engineers would you say are working at
- 9 Google right now?
- 10 A. **That's a good question. So Google is about 40 to**
- 11 **45,000 people right now. So I think from an engineering**
- 12 **perspective, we're above 25,000 or so. We like to maintain**
- 13 **a greater than 50 percent ratio, i.e., 50 percent or more of**
- 14 **the folks at Google are engineers.**
- 15 Q. How many of the people who work on advertising at
- 16 Google are engineers, sir?
- 17 A. **More than 2500 now.**
- 18 Q. Mr. Alferness, why did you come from California to
- 19 this courthouse to testify today?
- 20 A. **Google, Google works hard to innovate. We believe**
- 21 **very strongly in continually innovating and trying to invent**
- 22 **the future and we feel strongly about this not just from**
- 23 **Google's perspective, but from the broader ecosystem**
- 24 **perspective across all of technology. As such, we take**
- 25 **intellectual property and intellectual property rights very**

Alferness - direct

- 1 **seriously. So I'm here today to represent that on Google's**
 2 **behalf.**
 3 **Q.** Let's talk a little bit about Google's origins. When
 4 was Google founded?
 5 **A. Google was founded in 1998.**
 6 **Q.** How big was it when it was founded?
 7 **A. It was just two people. It was Larry Page and Sergey**
 8 **Brin.**
 9 **Q.** Where was the first office?
 10 **A. That's a good question. One could argue it might**
 11 **have been in their dorm room at Stanford, but I think the**
 12 **first formal office was in Susan Grinski's house or her**
 13 **garage.**
 14 MR. VERHOEVEN: Can we have DTX-1601, please?
 15 BY MR. VERHOEVEN:
 16 **Q.** What's that?
 17 **A. That's Susan's house with the garage, and then to the**
 18 **right you see really a dated picture of Larry Page and**
 19 **Sergey Brin.**
 20 **Q.** So you actually personally know this is the house
 21 they started the company in?
 22 **A. Oh, absolutely do. I've known Susan Grinski**
 23 **basically the whole time I've been at Google. The house is**
 24 **a piece of Google history and, of course, she doesn't live**
 25 **there anymore, but occasionally some of the other senior**

Alferness - direct

- 1 **executives will spend time in the house if they live far**
 2 **away. And our chief economist, for example, will spend**
 3 **nights there he has brought Susan's mail and still sometimes**
 4 **it still gets delivered to the house. So, yes, that's**
 5 **definitely her house.**
 6 **Q.** So there are the founders right there, Mr. Page and
 7 Mr. Brin?
 8 **A. Yes.**
 9 **Q.** Yes?
 10 **A. Yes.**
 11 **Q.** What were they working on during this very early time
 12 frame, sir?
 13 **A. Oh, they were working on a search engine.**
 14 **Q.** Can you explain to the jury, just really generally,
 15 what do you mean when you say search engine?
 16 **A. Sure thing. Let's see. At a high level, I would**
 17 **say a search engine is a web page, a site that folks can**
 18 **come to. You enter a query, a question in plain text,**
 19 **basically.**
 20 **It's the responsibility of the search engine,**
 21 **then, to look across all of the information that exists on**
 22 **the Internet, websites, web pages, et cetera, and find**
 23 **information that is relevant to answering the question that**
 24 **the user entered. Those results are then organized or**
 25 **sorted such that the highest value or the highest relevant**

Alferness - direct

- 1 **or useful result appear at the top of that stack, and**
 2 **those results are displayed on what we call a search results**
 3 **page.**
 4 MR. VERHOEVEN: Can we put up DDX-1602, please?
 5 BY MR. VERHOEVEN:
 6 **Q.** Mr. Alferness, what are we looking at here?
 7 **A. This is a very, very early screen shot or image of**
 8 **the Google Search results page.**
 9 **Q.** And how do you know that?
 10 **A. I was using it at the time. I was finishing up at**
 11 **Cal tech. I was a computer scientist, technologist geek.**
 12 **And just about everybody in the community, in the industry,**
 13 **knew about Google and knew about some of the great new**
 14 **innovations that this search engine was delivering. It**
 15 **was -- oh, I don't know, I would say it's much, much better**
 16 **than the competition. So I was certainly using it at the**
 17 **time, yes.**
 18 **Q.** Was there any specific technology that Mr. Page and
 19 Mr. Brin used to build the search engine?
 20 **A. Yes. They built a new technology called page rank.**
 21 **Q.** And you describe at a high level for the jury, what
 22 is page rank?
 23 **A. So page rank was a novel and new way of not only**
 24 **finding this information, but also sorting the results and**
 25 **finding the highest quality results. It did so by not just**

Alferness - direct

- 1 **looking at the content on the pages themselves to see how it**
 2 **matched the question, but to understand the importance of**
 3 **the papers.**
 4 **What it looked at is what pages were**
 5 **linking to that page in question. For example, if it was a**
 6 **page with authority, say a page from a newspaper, I don't**
 7 **know, CNN or the Wall Street Journal, then that one page**
 8 **that we were looking at might be considered higher quality.**
 9 **So really it was looking at those things that were pointing**
 10 **at these pages. Hence, page rank.**
 11 **Q.** Was this page rank technology important to Google?
 12 **A. It was, yes.**
 13 **Q.** And why was that?
 14 **A. It was probably the key innovation with Google Search**
 15 **that really made the results that Google Search returned**
 16 **above and beyond just better than the best.**
 17 **Q.** Is Google Search still available today?
 18 **A. It is, yes.**
 19 **Q.** Do users have to pay to use Google Search?
 20 **A. No, they don't.**
 21 **Q.** Can you give me some -- I take it, that Google has
 22 grown beyond the early days? It has more products?
 23 **A. We have, that's correct.**
 24 **Q.** Can you give the jury some examples?
 25 **A. Sure. One example would be Gmail. Another might be**