

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHT RESPONSE, LLC

v.

GOOGLE INC., et al.

NO. 2:07-CV-371-CE

JURY

DECLARATION OF ELIZABETH A. WILEY

My name is Elizabeth A. Wiley. I am a member of the State Bar of Texas, with The Wiley Firm PC, and one of the counsel of record for Bright Response, LLC (“Bright Response”) in the above-referenced action. The facts recited below regarding documents and correspondence maintained in the files for this case are true and correct and if called upon to testify I would truthfully testify thereto.

1. Exhibit A is a true and correct copy of Chart A-4 Claim Chart of “EZ Reader: Embedded AI For Automatic Electronic Mail Interpretation and Routing” to Defendants’ operative invalidity contentions.

2. Exhibit B is a true and correct copy of the article entitled “EZ Reader: Embedded AI for Automatic Electronic Mail Interpretation and Routing”.

3. Exhibit C is a true and correct copy of an excerpt of Dr. Branting’s chart, Ex. 2 to Branting report: “Anticipation under 35 U.S.C. § 102 and Obviousness under 35 U.S.C. 203 by EZ Reader.”

4. Exhibit D is a true and correct copy of an excerpt of Dr. Branting’s Chart A-69: U.S. Pat. No. 5,581,664 to Allen with the CBR Express Reference Manual as prior art to Asserted Claims of U.S. Patent No. 6,411,947 (“947 Patent”).

5. Exhibit E is a true and correct copy of page one of Dr. Branting’s Ex. 1.

6. Exhibit F is a true and correct copy of an excerpt of the Rebuttal Expert Report of Dr. V. Thomas Rhyne.

7. Exhibit G is a true and correct copy of an excerpt of the Expert Report of Harry F. Manbeck, Jr.

8. Exhibit H is a true and correct copy of an excerpt of US Provisional Application 60/042,494, originally produced as BR000065-96.

I declare under penalty of perjury that the above information is true and correct.

Executed this 22nd day of July, 2010, in Austin, Texas.

/s/ Elizabeth A. Wiley
Elizabeth A. Wiley