

EXHIBIT B

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

PA ADVISORS, LLC

Plaintiff,

v.

GOOGLE INC., et al,

Defendants.

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CIVIL ACTION NO. 2:07-CV-480 (D)

JURY TRIAL DEMANDED

PLAINTIFF’S FED.R.CIV.P. 26(a)(1) INITIAL DISCLOSURES

Plaintiff PA ADVISORS, LLC makes these initial disclosures as required by Federal Rule of Civil Procedure 26(a)(1) and the Scheduling Order entered in this action. Plaintiff reserves the right to amend these initial disclosures as necessary. Plaintiff also reserves the right to object to the admissibility of any information disclosed.

DISCLOSURES

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE:

Name	Address/Telephone	Brief Statement
Geller, Ilya	c/o PA Advisors’ Counsel, addresses and telephone numbers below.	Inventor of ‘067 patent. Knowledgeable regarding matters including the conception and reduction to practice of the invention of the ‘067 patent and the prosecution of the ‘067 patent.

Name	Address/Telephone	Brief Statement
Spangenberg, Erich	c/o PA Advisors' Counsel, addresses and telephone numbers below.	VP of Licensing for PA Advisors. Knowledgeable regarding matters including PA Advisors' acquisition of the patent-in-suit.

In addition, PA Advisors incorporates by reference: (i) any person identified by Defendants in their Initial Disclosures; and (ii) any person identified in any answer to any interrogatory and (iii) any experts identified by PA Advisors.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

RESPONSE: Please see the items previously produced in connection with Plaintiff's 3-1 and 3-2 Disclosures, such as the patent-in-suit and file history. Plaintiff also has documents relating to its acquisition of the patent-in-suit.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

RESPONSE: Damages adequate to compensate for Defendants' infringement, but in no event less than a reasonable royalty for the use made of the invention, together with interest and costs as fixed by the court, in accordance with 35 U.S.C.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: None.

Dated: September 5, 2008

Respectfully submitted,

PA ADVISORS, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished this 5th day of September, 2008 to counsel of record as follows:

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