

EXHIBIT C

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

PA ADVISORS, LLC

Plaintiff,

v.

GOOGLE INC., et al,

Defendants

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

**JURY TRIAL
DEMANDED**

GOOGLE INC.'S SECOND SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Rules 26(a)(1) and (e) of the Federal Rules of Civil Procedure and the Agreed Docket Control Order, Defendant Google Inc. (“Google”) hereby makes the following supplemental initial disclosures. Google bases the following disclosures on information currently and reasonably available. Google reserves the right to supplement these disclosures, as necessary, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, and to rely on the testimony of any person it subsequently identifies as having knowledge relevant to this dispute. Google’s supplemental initial disclosures are made without waiving Google’s right to object to any discovery request or other proceeding related to the subject matter of these disclosures on the basis of competency, privilege, relevancy, materiality, hearsay, or any other proper ground for objection.

Google’s current understanding of the accused instrumentalities is based on Plaintiff PA Advisors, LLC’s (“PA Advisors”) Disclosure of Asserted Claims and Infringement Contentions served on August 22, 2008 in which PA Advisors disclosed that it is accusing certain features of Google Search (including Web Search, Advanced Search, iGoogle, and Google Toolbar), Google AdWords and/or AdSense, and Gmail (“Accused Instrumentalities”), of infringing U.S. Patent No. 6,199,067 (“the ‘067 patent”).

I. CORRECT NAMES OF PARTIES

The correct name of Defendant Google is Google Inc. On information and belief, the correct name of Plaintiff PA Advisors is PA Advisors, LLC, and the correct name of Defendant Yahoo is Yahoo! Inc.

II. POTENTIAL PARTIES

Ilya Geller and Mightiest Logicon Unisearch, Inc. (“MLU”) are potential additional parties to this action. Mr. Geller is the named inventor of the ‘067 patent and the patent was assigned to MLU. Mr. Geller and MLU may have ownership interests in the ‘067 patent.

III. LEGAL THEORIES AND FACTUAL BASIS OF DEFENDANT’S DEFENSES

Non-Infringement

Google does not and has not infringed any valid and enforceable claim of the ‘067 patent. Properly construed, no valid and enforceable claim of the ‘067 patent covers, either literally or under the doctrine of equivalents, any features of the accused instrumentalities. Facts supporting Google’s non-infringement contentions may include, but are not limited to, the structure, characteristics, and operation of the accused features of the accused instrumentalities, the ‘067 patent and its prosecution history, and any admissions by PA Advisors regarding the ‘067 patent.

Invalidity

The ‘067 patent is invalid for failing to satisfy one or more requirements for patentability under the patent laws of the United States, as set forth in Title 35 of the United States Code, including without limitation, the requirements set forth in sections 101, 102, 103, and 112. Google has provided details of its invalidity positions in Defendants’ Invalidity Contentions, prepared pursuant to Patent Rule 3-3 and served on November 14, 2008.

Lack of Standing

On information and belief, Plaintiff lacks the standing necessary to assert the claims of the '067 patent against Google.

Unclean Hands

On information and belief, the claims of the '067 patent are unenforceable due to Plaintiff's unclean hands.

IV. PERSONS WITH KNOWLEDGE

Based on Google's current understanding of the claims asserted by PA Advisors, Google identifies the following individuals as having knowledge of relevant facts:

Name	Contact Information	Connection to Case	Knowledge
Bryan Horling	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Structure, characteristics, and/or operation of the accused features of Personalized Search
Kavi Goel	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Business and financial aspects of Personalized Search

Name	Contact Information	Connection to Case	Knowledge
Albert Bodenhamer	<p>May be reached through counsel for GOOGLE.</p> <p>Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000</p>	Google employee	Structure, characteristics, and/or operation of the accused features of Google Toolbar
Jonathan Alferness	<p>May be reached through counsel for GOOGLE.</p> <p>Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000</p>	Google employee	Structure, characteristics, and/or operation of the accused features of Google AdWords
Greg Badros	<p>May be reached through counsel for GOOGLE.</p> <p>Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000</p>	Google employee	Structure, characteristics, and/or operation of the accused features of Gmail
Shane Antos	<p>May be reached through counsel for GOOGLE.</p> <p>Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000</p>	Google employee	Past business and financial aspects of the accused instrumentalities; damages

Name	Contact Information	Connection to Case	Knowledge
Mary Hollendonor	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Business and financial aspects of the accused instrumentalities; damages
Michelle Lee	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Google patent licensing practices and policies related to the accused instrumentalities; damages
Gabe Mattera	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Business and financial aspects of the accused instrumentalities; damages
Chris Rohrs	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Structure, characteristics, and/or operation of the accused features of iGoogle

Name	Contact Information	Connection to Case	Knowledge
Amit Singhal	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Structure, characteristics, and/or operation of the accused features of Google Search
Johanna Wright	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Business and financial aspects of Google Search
Jack Menzel	May be reached through counsel for GOOGLE. Quinn Emanuel Urquhart Oliver & Hedges, LLP 555 Twin Dolphin Drive, Suite 560 Redwood Shores, CA 94065 (650) 801-5000	Google employee	Business and financial aspects of Google Search
Ilya Geller	Unknown	Named inventor of U.S. Patent No. 6,119,067	Conception and reduction to practice of U.S. Patent No. 6,119,067
Mightiest Logicon Unisearch, Inc.	Unknown	Allegedly assigned U.S. Patent No. 6,119,067 to PA Advisors	The extent of PA Advisors' ownership interest in U.S. Patent No. 6,119,067
Edward Etkin	Unknown	Attorney or agent responsible for prosecution of '067 patent	Prosecution of '067 patent

Name	Contact Information	Connection to Case	Knowledge
Kjersti Aas	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>A Survey On Personalised Information Filtering Systems For The World Wide Web</i>
Rakesh Agrawal	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,233,575; <i>Multilevel Taxonomy Based on Features Derived from Training Documents Classification Using Fisher Values as Discrimination Values</i>
Don Ahn	Daly City, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,696,963; <i>System, Method and Computer Product for Searching Through An Individual Document And A Group of Documents</i>
Kenneth P. Baclawski	Waltham, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,192,364; <i>Distributed Computer Database System And Method Employing Intelligent Agents</i>
Michael J. Barbarino	Moss Beach, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,544,049; <i>Method For Performing A Search Of A Plurality Of Documents For Similarity To A Plurality Of Query Words</i>

Name	Contact Information	Connection to Case	Knowledge
Nicholas J. Belkin	Rutgers University New Brunswick, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Information Filtering And Information Retrieval: Two Sides Of The Same Coin?</i>
Viktors Berstis	Austin, TX	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,092,100; <i>Method For Intelligently Resolving Entry Of An Incorrect Uniform Resource Locator (URL)</i>
Stefan Besling	Aachen, DE	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 6,363,348; <i>User Model-Improvement-Data-Driven Selection And Update Of User-Oriented Recognition Model Of A Given Type For Word Recognition At Network Server</i> ; U.S. Patent No. 6,430,551; <i>Vocabulary And/Or Language Model Training</i>
Eric A. Bier	Los Altos, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>
Daniel Billsus	Department of Information and Computer Science University of California, Irvine Irvine, CA 92697	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Learning And Revising User Profiles: The Identification Of Interesting Web Sites</i>

Name	Contact Information	Connection to Case	Knowledge
Eric Bloedorn	Machine Learning and Inference Laboratory, George Mason University, Fairfax, VA 22030	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Machine Learning Of User Profiles: Representational Issues</i>
Daniel G. Bobrow	Palo Alto, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>
Lisa Braden-Harder	Reston, VA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,933,822; <i>Apparatus And Methods For An Information Retrieval System That Employs Natural Language Processing Of Search Results To Improve Overall Precision</i>
Cyril Brookes	Sydney, Australia	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,428,778; <i>Selective Dissemination Of Information</i>
Scott M. Burke	Corvallis, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,289,353; <i>Intelligent Query System For Automatically Indexing In A Database And Automatically Categorizing Users</i>

Name	Contact Information	Connection to Case	Knowledge
Daniel Chang	2611 Hastings Dr. Belmont, CA 94002	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,694,594; <i>System For Linking Hypermedia Data Objects In Accordance With Associations Of Source And Destination Data Objects And Similarity Threshold Without Using Keywords Or Link-Defining Terms</i>
Soumen Charkrabarti	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,233,575; <i>Multilevel Taxonomy Based on Features Derived from Training Documents Classification Using Fisher Values as Discrimination Values</i>
Liren Chen	The Robotics Institute Carnegie Mellon University Pittsburgh, PA 15213	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>WebMate: A Personal Agent For Browsing And Searching</i>
Boris Chidlovskii	Meylan, FR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,327,590; <i>System And Method For Collaborative Ranking Of Search Results Employing User And Group Profiles Derived From Document Collection Content Analysis</i>
Liviu Chiriac	Plainsboro, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,363,377; <i>Search Data Processor</i>

Name	Contact Information	Connection to Case	Knowledge
Alexander Chislenko	Cambridge, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,041,311; <i>Method And Apparatus For Item Recommendation Using Automated Collaborative Filtering</i>
Kenneth Ward Church	Bell Laboratories Murray Hill, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Word Association Norms, Mutual Information And Lexicography</i>
Gideon David Cohen	Mazor, Israel	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,067,539; <i>Intelligent Information Retrieval System</i>
Simon H. Corston	Seattle, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,933,822; <i>Apparatus And Methods For An Information Retrieval System That Employs Natural Language Processing Of Search Results To Improve Overall Precision</i>
W. Bruce Croft	University of Massachusetts, Amherst	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Information Filtering And Information Retrieval: Two Sides Of The Same Coin?</i>

Name	Contact Information	Connection to Case	Knowledge
Gary Culliss	9737 Larsent St. Overland Park, KS 66214	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 6,006,222; <i>Method For Organizing Information</i> ; U.S. Patent No. 6,078,916; <i>Method For Organizing Information</i> ; U.S. Patent No. 6,182,068; <i>Personalized Search Methods</i>
Douglass R. Cutting	Menlo Park, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>
Vasanthan S. Dasan	Colorado Springs, CO	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,761,662; <i>Personalized Information Retrieval Using User-Defined Profile</i>
Owen Davis	214 W. 102nd St., #2A New York, NY 10025	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,138,155; <i>Method And Apparatus For Tracking Client Interaction With A Network Resource And Creating Client Profiles And Resource Database</i>

Name	Contact Information	Connection to Case	Knowledge
Rick Dedrick	Hillsboro, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 5,710,884; <i>System For Automatically Updating Personal Profile Server With Updates To Additional User Information Gathered From Monitoring User's Electronic Consuming Habits Generated On Computer During Use</i> ; U.S. Patent No. 5,717,923; <i>Method And Apparatus For Dynamically Customizing Electronic Information To Individual End Users</i>
Scott Deerwester	Graduate Library School University of Chicago Chicago, IL 60637	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Indexing by Latent Semantic Analysis</i>
Steven DeJarnett	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,430,551; <i>Vocabulary And/Or Language Model Training</i>
Chanda Dharap	Fremont, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,256,633; <i>Context-Based And User-Profile Driven Information Retrieval</i>

Name	Contact Information	Connection to Case	Knowledge
William B. Dolan	Redmond, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,933,822; <i>Apparatus And Methods For An Information Retrieval System That Employs Natural Language Processing Of Search Results To Improve Overall Precision</i>
Byron Edward Dom	Los Gatos, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,233,575; <i>Multilevel Taxonomy Based on Features Derived from Training Documents Classification Using Fisher Values as Discrimination Values</i>
Jim Driscoll	Orlando, FL	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,576,954; <i>Process For Determination Of Text Relevancy</i>
Susan T. Dumais	Bell Communications Research 435 South St. Morristown, NJ 07960	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>Personalized Information Delivery: An Analysis Of Information Filtering Methods, and; Indexing by Latent Semantic Analysis</i>
Matthias Eichstaedt	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,385,619; <i>Automatic User Interest Profile Generation From Structured Document Access Information</i>

Name	Contact Information	Connection to Case	Knowledge
Jason M. Eisner	1015 Spruce St. Philadelphia, PA 19107	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,835,087; <i>System For Generation Of Object Profiles For A System For Customized Electronic Identification Of Desirable Objects</i>
Jeffrey Esakov	Hamilton Square, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,363,377; <i>Search Data Processor</i>
Peter W. Foltz	Box 345, Dept. of Psychology University of Colorado Boulder, CO 80309	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>Using Latent Semantic Indexing For Information Filtering, and; Personalized Information Delivery: An Analysis Of Information Filtering Methods</i>
Thomas Valentine Frauenhofer	Stony Point, NY	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,236,991; <i>Method And System For Providing Access For Categorized Information From Online Internet And Intranet Sources</i>
George W. Furnas	Bell Communications Research 435 South St. Morristown, NJ 07960	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Indexing by Latent Semantic Analysis</i>
Stephen I. Gallant	49 Fenno St. Cambridge, MA 02138	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,317,507; <i>Method For Document Retrieval And For Word Sense Disambiguation Using Neural Networks</i>

Name	Contact Information	Connection to Case	Knowledge
Natalie S. Glance	Meylan, FR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,327,590; <i>System And Method For Collaborative Ranking Of Search Results Employing User And Group Profiles Derived From Document Collection Content Analysis</i>
Thomas A. Gerace	Cambridge, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,848,396; <i>Method And Apparatus For Determining Behavioral Profile Of A Computer User</i>
Erik D. Goodman	East Lansing, MI	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,924,105; <i>Method And Product For Determining Salient Features For Use In Information Searching</i>
Antonietta Grasso	Grenoble, FR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,327,590; <i>System And Method For Collaborative Ranking Of Search Results Employing User And Group Profiles Derived From Document Collection Content Analysis</i>
Per-Kristian Halvorsen	Los Altos, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>

Name	Contact Information	Connection to Case	Knowledge
Patrick Hanks	Collins Publishers Glasgow, Scotland	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Word Association Norms, Mutual Information And Lexicography</i>
Richard Harshman	University of Western Ontario London, Ontario Canada	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Indexing by Latent Semantic Analysis</i>
Alexander G. Hauptmann	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>From Syntax To Meaning In Natural Language Processing</i>
Brian L. Hazlehurst	Portland, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,289,353; <i>Intelligent Query System For Automatically Indexing In A Database And Automatically Categorizing Users</i>
Marti A. Hearst	San Francisco, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,659,766; <i>Method And Apparatus For Inferring The Topical Content Of A Document Based Upon Its Lexical Content Without Supervision</i>
Richard D. Henderson	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,544,049; <i>Method For Performing A Search Of A Plurality Of Documents For Similarity To A Plurality Of Query Words</i>

Name	Contact Information	Connection to Case	Knowledge
Frederick S. M. Herz	P.O. Box 625 Canaan Valley Davis, W. VA 26260 OR Condominium C-304, Herzwood Canaan Valley Davis, W. VA 26260	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 5,835,087; <i>System For Generation Of Object Profiles For A System For Customized Electronic Identification Of Desirable Objects</i> ; U.S. Patent No. 6,460,036; <i>System And Method For Providing Customized Electronic Newspapers And Target Advertisements</i> ; U.S. Patent No. 5,758,257; <i>System And Method For Scheduling Broadcast Of And Access To Video Programs And Other Data Using Customer Profiles</i>
William Colyer Hill	Montville, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,029,192; <i>System And Method For Locating Resources On A Network Using Resource Evaluations Derived From Electronic Messages</i>
Maria Azua Himmel	Austin, TX	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,092,100; <i>Method For Intelligently Resolving Entry Of An Incorrect Uniform Resource Locator (URL)</i>

Name	Contact Information	Connection to Case	Knowledge
Kaji Hiroyuki	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including Japanese Patent No. 2000-132559; <i>Information Filtering System And Profile Updating Method In The Same</i>
Philip Hooper	Santa Clara, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including: European Patent No. 1,246,087; <i>A Computer Implemented Method And System For Information Retrieval</i> ; European Patent No. 1,291,788; <i>A Computer Implemented Method and System For Information Retrieval</i>
Xuedong D. Huang	Redmond, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,418,431; <i>Information Retrieval And Speech Recognition Based On Language Models</i>
Paul Jacobs	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Acquiring Lexical Knowledge From Text: A Case Study</i>
Vidyut Jain	352 6th Ave., #3 Brooklyn, NY 11215	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,138,155; <i>Method And Apparatus For Tracking Client Interaction With A Network Resource And Creating Client Profiles And Resource Database</i>

Name	Contact Information	Connection to Case	Knowledge
Jun-Tae Kim	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>Semantic Knowledge Acquisition For Information Extraction From Texts on Parallel Marker-Passing Computer,</i> and <i>Acquisition Of Semantic Patterns For Information Extraction From Corpora</i>
Gregory H. Kisor	Beaverton, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,978,847; <i>Attribute Pre-Fetch Of Web Pages</i>
Robert R. Korfhage	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Query Enhancement by User Profiles,</i> and; <i>Towards An Intelligent And Personalized Retrieval System</i>
Dina Kravets	West Windsor, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,363,377; <i>Search Data Processor</i>
Murali R. Krishnan	Bellevue, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,366,956; <i>Relevance Access Of Internet Information Services</i>
Julian M. Kupiec	Cupertino, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,519,608; <i>Method For Extracting From A Text Corpus Answers To Questions Stated In Natural Language By Using Linguistic Analysis And Hypothesis Generation</i>

Name	Contact Information	Connection to Case	Knowledge
Stephen J. Kurtzman, II	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,044,376; <i>Content Stream Analysis</i>
Wai Yeung Lam	The Chinese University of Hong Kong Shatin, Hong Kong	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>A Multilevel Approach To Intelligent Information Filtering: Model, System, And Evaluation, and; Detection Of Shifts In User Interests For Personalized Information Filtering</i>
Thomas K. Landauer	Bell Communications Research 435 South St. Morristown, NJ 07960	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Indexing by Latent Semantic Analysis</i>
Henrik Legind Larsen	Roskilde University, Roskilde	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>A Fuzzy Genetic Algorithm Approach To An Adaptive Information Retrieval Agent</i>
Yezdezard Z. Lashkari	Cambridge, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,041,311; <i>Method And Apparatus For Item Recommendation Using Automated Collaborative Filtering</i>
Wendy Lehnert	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Automated Dictionary Construction For Information Extraction From Text</i>

Name	Contact Information	Connection to Case	Knowledge
Qi Lu	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,385,619; <i>Automatic User Interest Profile Generation From Structured Document Access Information</i>
T. Richard MacMillan	Artificial Intelligence Technical Center, the MITRE Corp., Z40, 11820 Dolley Madison Blvd., McLean, VA 22102	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Machine Learning Of User Profiles: Representational Issues</i>
Stefano Magrini	IBM Italy, Rome Scientific Center, via del Giorgione 159, Roma	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Acquisition Of Semantic Patterns From A Natural Corpus of Texts</i>
Milind V. Mahajan	Redmond, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,418,431; <i>Information Retrieval And Speech Recognition Based On Language Models</i>
Udi Manber	Department of Computer Science University of Arizona Tucson, AZ 85721	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>GLIMPSE: A Tool To Search Through Entire File Systems</i>
Inderjeet Mani	Artificial Intelligence Technical Center, the MITRE Corp., Z40, 11820 Dolley Madison Blvd., McLean, VA 22102	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Machine Learning Of User Profiles: Representational Issues</i>

Name	Contact Information	Connection to Case	Knowledge
Joaquin Manuel Marques	Greenwich, CT	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,236,991; <i>Method And System For Providing Access For Categorized Information From Online Internet And Intranet Sources</i>
Maria J. Martin-Bautista	Granada University Granada, Spain	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>A Fuzzy Genetic Algorithm Approach To An Adaptive Information Retrieval Agent</i>
John E. McNulty	Burlington, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 6,041,311; <i>Method And Apparatus For Item Recommendation Using Automated Collaborative Filtering</i> ; U.S. Patent No. 6,049,777; <i>Computer-Implemented Collaborative Filtering Based Method For Recommending An Item To A User</i>
Carl F. Meske	San Jose, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including: European Patent No. 1,246,087; <i>A Computer Implemented Method And System For Information Retrieval</i> ; European Patent No. 1,291,788; <i>A Computer Implemented Method and System For Information Retrieval</i>

Name	Contact Information	Connection to Case	Knowledge
Max E. Metral	Boston, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,049,777; <i>Computer-Implemented Collaborative Filtering Based Method For Recommending An Item To A User</i>
Dan I. Moldovan	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Acquisition Of Semantic Patterns For Information Extraction From Corpora</i>
Michael Edward Moran	Ridgewood, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,236,991; <i>Method And System For Providing Access For Categorized Information From Online Internet And Intranet Sources</i>
Masahiro Morita	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Information Filtering Based On User Behavior Analysis And Best Match Text Retrieval</i>
Javed Mostafa	Indiana University Bloomington, IN	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>A Multilevel Approach To Intelligent Information Filtering: Model, System, And Evaluation, and; Detection Of Shifts In User Interests For Personalized Information Filtering</i>

Name	Contact Information	Connection to Case	Knowledge
Snehasis Mukhopadhyay	Purdue University West Lafayette, IN	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>A Multilevel Approach To Intelligent Information Filtering: Model, System, And Evaluation</i> , and; <i>Detection Of Shifts In User Interests For Personalized Information Filtering</i>
Sung H. Myaeng	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Towards An Intelligent And Personalized Retrieval System</i>
Kristopher E. Nybakken	Portland, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,289,353; <i>Intelligent Query System For Automatically Indexing In A Database And Automatically Categorizing Users</i>
Mark R. Opperman	Palo Alto, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including: European Patent No. 1,246,087; <i>A Computer Implemented Method And System For Information Retrieval</i> ; European Patent No. 1,291,788; <i>A Computer Implemented Method and System For Information Retrieval</i>

Name	Contact Information	Connection to Case	Knowledge
Adrian O’Riordan	Department of Computer Science University College Cork, Ireland	Potential Prior Art Witness	Prior Art to the ‘067 patent, including <i>An Intelligent Agent for High-Precision Text Filtering</i>
Lawrence Page	Stanford, CA	Potential Prior Art Witness	Prior Art to the ‘067 patent, including U.S. Patent No. 6,285,999; <i>Method For Node Ranking In A Linked Database</i>
Mathew Joseph Palakal	Purdue University West Lafayette, IN	Potential Prior Art Witness	Prior Art to the ‘067 patent, including <i>A Multilevel Approach To Intelligent Information Filtering: Model, System, And Evaluation</i> , and; <i>Detection Of Shifts In User Interests For Personalized Information Filtering</i>
Subhas Palchowdhury	Mahopac, NY	Potential Prior Art Witness	Prior Art to the ‘067 patent, including U.S. Patent No. 6,236,991; <i>Method And System For Providing Access For Categorized Information From Online Internet And Intranet Sources</i>
Maria Teresa Paziienza	University of Roma, di Informatica e Sistemistica, via Boonarroll 12, Roma	Potential Prior Art Witness	Prior Art to the ‘067 patent, including <i>Acquisition Of Semantic Patterns From A Natural Corpus of Texts</i>
Michael Pazzani	Department of Information and Computer Science University of California, Irvine Irvine, CA 92697	Potential Prior Art Witness	Prior Art to the ‘067 patent, including <i>Learning And Revising User Profiles: The Identification Of Interesting Web Sites</i>

Name	Contact Information	Connection to Case	Knowledge
Jan O. Pedersen	Palo Alto, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>
William F. Punch, III	Williamston, MI	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,924,105; <i>Method And Product For Determining Salient Features For Use In Information Searching</i>
Prabhakar Raghavan	Saratoga, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,233,575; <i>Multilevel Taxonomy Based on Features Derived from Training Documents Classification Using Fisher Values as Discrimination Values</i>
Jeffrey Alan Rapaport	362 West Olive Ave. Sunnyvale, CA 94086	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,890,152; <i>Personal Feedback Browser For Obtaining Media Files</i>
Seymour Alvin Rapaport	1050 Crooked Creek Dr. Los Altos, CA 94024	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,890,152; <i>Personal Feedback Browser For Obtaining Media Files</i>

Name	Contact Information	Connection to Case	Knowledge
Kenneth W. Reese	Portland, OR	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 6,374,237; <i>Data Set Selection Based Upon User Profile</i> ; U.S. Patent No. 5,978,847; <i>Attribute Pre-Fetch Of Web Pages</i>
Ellen Riloff	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Automated Dictionary Construction For Information Extraction From Text</i>
Marcos Salganicoff	2425 Olive St. Philadelphia, PA 19130	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,758,257; <i>System And Method For Scheduling Broadcast Of And Access To Video Programs And Other Data Using Customer Profiles</i>
Eric Saund	San Carlos, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,659,766; <i>Method And Apparatus For Inferring The Topical Content Of A Document Based Upon Its Lexical Content Without Supervision</i>
Jeffrey Stephen Schaffer	Ridgefield, CT	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,236,991; <i>Method And System For Providing Access For Categorized Information From Online Internet And Intranet Sources</i>

Name	Contact Information	Connection to Case	Knowledge
Hinrich Schuetze	Stanford, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,675,819; <i>Document Information Retrieval Using Global Word Co-Occurrence Patterns</i>
Jonathan Ari Sheena	Cambridge, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,049,777; <i>Computer-Implemented Collaborative Filtering Based Method For Recommending An Item To A User</i>
Yoichi Shinoda	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Information Filtering Based On User Behavior Analysis And Best Match Text Retrieval</i>
David M. Siefert	Englewood, OH	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 5,778,380; <i>Intelligent Resource Transformation Engine For Translating Files;</i> European Patent No. 674,282; <i>Method And Apparatus For Searching In Repositories Of Information Resources</i>
Humphrey Sorensen	Department of Computer Science University College Cork, Ireland	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>An Intelligent Agent for High-Precision Text Filtering</i>

Name	Contact Information	Connection to Case	Knowledge
Danny Sullivan	http://calafia.com/forms/feedform.htm	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Direct Hit Debuts Personalized Search</i> , and; <i>Global Brain To Offer Profile Searching</i>
James J. Sullivan	Arlington, MA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,049,777; <i>Computer-Implemented Collaborative Filtering Based Method For Recommending An Item To A User</i>
Katia Sycara	The Robotics Institute Carnegie Mellon University Pittsburgh, PA 15213	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>WebMate: A Personal Agent For Browsing And Searching</i>
Shang-Hua Teng	Champaign, IL	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,385,619; <i>Automatic User Interest Profile Generation From Structured Document Access Information</i>
Loren Gilbert Terveen	Basking Ridge, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,029,192; <i>System And Method For Locating Resources On A Network Using Resource Evaluations Derived From Electronic Messages</i>

Name	Contact Information	Connection to Case	Knowledge
Eric Thelen	Aachen, DE	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 6,363,348; <i>User Model-Improvement-Data-Driven Selection And Update Of User-Oriented Recognition Model Of A Given Type For Word Recognition At Network Server</i> ; U.S. Patent No. 6,430,551; <i>Vocabulary And/Or Language Model Training</i>
John W. Tukey	Princeton, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,278,980; <i>Iterative Technique For Phrase Query Formation And An Information Retrieval System Employing Same</i>
Howard R. Turtle	Woodbury, MN	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,418,948; <i>Concept Matching Of Natural Language Queries With A Database Of Document Concepts</i>

Name	Contact Information	Connection to Case	Knowledge
Lyle H. Ungar	321 S. 20th St. Philadelphia, PA 19103	Potential Prior Art Witness	Prior Art to the '067 patent, including: U.S. Patent No. 5,835,087; <i>System For Generation Of Object Profiles For A System For Customized Electronic Identification Of Desirable Objects</i> ; U.S. Patent No. 5,758,257; <i>System And Method For Scheduling Broadcast Of And Access To Video Programs And Other Data Using Customer Profiles</i>
Lucy H. Vanderwende	Bellevue, WA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,933,822; <i>Apparatus And Methods For An Information Retrieval System That Employs Natural Language Processing Of Search Results To Improve Overall Precision</i>
Paolo Velardi	University of Ancona, Istituto di Informatica, via Brece Bianche, Ancona	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>Acquisition Of Semantic Patterns From A Natural Corpus of Texts</i>
Amparo Vila	Granada University Granada, Spain	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>A Fuzzy Genetic Algorithm Approach To An Adaptive Information Retrieval Agent</i>

Name	Contact Information	Connection to Case	Knowledge
David Wachob	8379 Glen Rd. Elkins Park, PA 19117	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,758,257; <i>System And Method For Scheduling Broadcast Of And Access To Video Programs And Other Data Using Customer Profiles</i>
Suz Hsi Wan	Princeton, NJ	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 6,363,377; <i>Search Data Processor</i>
Michael Weiss	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including United Kingdom Patent No. 2,335,761; <i>Information Search Using User Profile</i>
Kelly Wical	San Carlos, CA	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,940,821; <i>Information Presentation In A Knowledge Base Search And Retrieval System</i>
Sun Wu	Department of Computer Sciences National Chung-Cheng University Ming-Shohng, Chia-Yi, Taiwan	Potential Prior Art Witness	Prior Art to the '067 patent, including <i>GLIMPSE: A Tool To Search Through Entire File Systems</i>
Marilyn R. Wulfekuhler	Lansing, MI	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,924,105; <i>Method And Product For Determining Salient Features For Use In Information Searching</i>

Name	Contact Information	Connection to Case	Knowledge
Morimoto Yasutsusugu	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including Japanese Patent No. 2000-132559; <i>Information Filtering System And Profile Updating Method In The Same</i>
Mishina Yusuke	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including Japanese Patent No. 2000-132559; <i>Information Filtering System And Profile Updating Method In The Same</i>
Uri Zernik	Unknown	Potential Prior Art Witness	Prior Art to the '067 patent, including: <i>Acquiring Lexical Knowledge From Text: A Case Study</i> , and; <i>Lexical Acquisition: Exploiting On-Line Resources To Build A Lexicon</i>
Jian Zhang	836 Cooper Landing Rd., Apt. #421E Cherry Hill, NJ 08002	Potential Prior Art Witness	Prior Art to the '067 patent, including U.S. Patent No. 5,758,257; <i>System And Method For Scheduling Broadcast Of And Access To Video Programs And Other Data Using Customer Profiles</i>

In addition to the above-listed individuals, Google incorporates by reference the individuals disclosed by PA Advisors, Yahoo!, and 24/7 Real Media pursuant to Fed. R. Civ. P. 26 as if set forth fully herein. Google may learn the identities of additional witnesses possessing information relevant under Fed. R. Civ. P. 26(a)(1) who are presently unknown to it, or it may come to appreciate that certain individuals known to them possess such information, and Google

expressly reserves the right to supplement this response pursuant to Fed. R. Civ. P. 26(e) as its investigation continues.

V. CATEGORIES AND LOCATIONS OF DOCUMENTS

Pursuant to Fed. R. Civ. P. 26(a)(1)(B), Google will make available documents that are in the possession, custody, or control of Google and that Google believes may be used to support its claims or defenses. Google provides below a list of the categories of documents that are in its possession, custody, or control and that it believes may be used to support its claims or defenses:

- Information relating to the structure, characteristics, and operation of the accused features of the Accused Instrumentalities,
- Information relating to the invalidity of the '067 patent

Such documents will be made available at the offices of Quinn Emanuel Urquhart Oliver & Hedges, LLP, 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065.

Google will produce documents as required by the Court's Orders or agreement of the parties.

Google may learn of additional documents relevant under Fed. R. Civ. P. 26(a)(1) that are presently unknown to it, or it may come to appreciate that certain documents are relevant.

Google will appropriately supplement its initial disclosures to reflect such additional information.

VI. DAMAGES

Google may seek attorneys' fees and costs pursuant to 35 U.S.C. § 285.

VII. INDEMNITY AND INSURING AGREEMENTS

Google is not aware at this time of any indemnity or insuring agreements under which any person or entity may be liable to satisfy part or all of any judgment entered in this action against Google, or to indemnify Google for payments made to satisfy any such judgment.

VIII. SETTLEMENT AGREEMENTS

Other than settlement agreements of other defendants to this action, Google is not aware at this time of any settlement agreement related to the subject matter of this action.

IX. STATEMENT OF ANY PARTY

At the present time, Google has no statements other than those disclosed above and those that may be produced in documents pursuant to the schedule set forth in the Agreed Docket Control Order.

X. TESTIFYING EXPERTS

Google has not yet determined whom its testifying experts will be in this matter. By agreement of the parties, Google will provide this information at the time of the Markman hearing in this action.

Dated: May 18, 2009

Respectfully submitted,

Michael Ernest Richardson
BECK REDDEN & SECREST
1221 McKinney, Suite 4500
Houston, TX 77010-2010
Telephone: (713) 951-6284
Facsimile: (713) 951-3720
Email: mrichardson@brsfirm.com

**QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP**

By: /s/ Brian C. Cannon
Brian C. Cannon (CA Bar No. 193071)
Quinn Emanuel Urquhart Oliver & Hedges
555 Twin Dolphin Dr, Suite 560
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100
Email: briancannon@quinnemanuel.com

ATTORNEYS FOR DEFENDANT
GOOGLE, INC.

CERTIFICATE OF SERVICE

I hereby certify pursuant to 28 U.S.C. § 1746 under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. On May 18, 2009, I caused to be served the foregoing *Google's Inc.'s Second Supplemental Initial Disclosures* by email, on the following persons at the identified addresses:

Andrew Wesley Spangler
Kim Lawrason
Spangler Law PC
208 N. Green St., Suite 300
Longview, TX 75601
903-753-9300
Fax: 903-553-0403
Email: spangler@spanglerlawpc.com
Email: klawrason@spanglerlawpc.com

Patrick Rolf Anderson
Patrick R. Anderson, PLLC
4225 Miller Rd., Bldg. B-9, Suite 358
Flint, MI 48507
517-303-4806
Fax: 248-928-9239
Email: patrick@praplpc.com

David Michael Pridham
Law Office of David Pridham
25 Linden Road
Barrington, RI 02806
401-633-7247
Fax: 401-633-7247
Email: david@PridhamIPLaw.com

John J. Edmonds
The Edmonds Law Firm, PC
709 Sabine Street
Houston, TX 77007
713-858-3320
Fax: 832-415-2535
Email: johnedmonds@edmondslegal.com

ATTORNEYS FOR PLAINTIFF PA
ADVISORS, LLC

Jason C White
Howrey LLP - Chicago
321 North Clark Street
Suite 3400
Chicago, IL 60610
312/846-4680
Fax: 312/602-3986
Email: whitej@howrey.com

John Frederick Bufe
Potter Minton

P. O. Box 359
Tyler, TX 75710
903/597/8311
Fax: 9035930846
Email: johnbufe@potterminton.com

Michael Edwin Jones
Potter Minton PC
110 N College
Suite 500
PO Box 359
Tyler, TX 75710-0359
903/597/8311
Fax: 9035930846
Email: mikejones@potterminton.com

ATTORNEYS FOR DEFENDANT
YAHOO! INC.

Dated: May 18, 2009

/s/ Andrea Pallios Roberts