EXHIBIT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PA ADVISORS, LLC,	§		
	§		
Plaintiff,	§		
	§		
v.	§	CASE NO. 2:07-cv-480-DF	
	§		
GOOGLE, INC., *et al.*	§	**JURY TRIAL DEMANDED**	
	§		
Defendants.	§		

**EXPERT REPORT OF
ALAN H. GORDON**

profiles… . The Dasan and Siefert patents disclose the use of **user profiles**. Therefore, they are material pieces of prior art." Mossinghoff report at ¶ 18.

41.   In respect of the Dasan and Siefert patents, I reviewed the prosecution history of the Geller patent and reviewed the Dasan and Siefert patents in relation to the prior art of record in the Geller patent and the claims that were considered by the Examiner. The Dasan and Siefert patents appear merely cumulative to information that was considered by the Examiner in the prosecution of the Geller patent. My opinions in respect of the materiality of these references are informed by the opinions of PA's technical expert, Thomas Rhyne. Mr. Rhyne is of the opinion that the Dasan and Siefert patents are merely cumulative to information that was considered by the Examiner in the prosecution of the Geller patent.

42.   The "**user profile**" allegedly taught by the Dasan and Siefert patents is, in fact, taught by the Hoffberg patent that was of record and considered by the Examiner in the prosecution of the Geller patent. Hence, in respect of this feature, the Dasan and Siefert patents are merely cumulative of the prior art considered by the Examiner in the prosecution of the Geller patent. Information that is merely cumulative of information already of record in an application is not material for purposes of determining whether there occurred a violation of Rule 56 or inequitable conduct.

43.   In further support of and consistent with Mr. Rhyne's opinion that the Dasan and Siefert patents are not material to the prosecution of the Geller patent is the prosecution history of the PCT application. In the International Preliminary Examination Report dated October 9, 2000, the PCT Examiner issued a report stating the following: