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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 IN RE GOOGLE INC. GMAIL
15 LITIGATION

16 Case No. 5:13-md-002430 LHK (PSG)

17 **EXHIBIT G TO DECLARATION
18 OF HAN LEE IN SUPPORT OF
19 DEFENDANT GOOGLE INC.'S
20 ADMINISTRATIVE MOTION TO
21 FILE DOCUMENTS AND PORTIONS
22 OF DOCUMENTS UNDER SEAL [D89]**

23 Judge: Hon. Lucy H. Koh
24 Dept: Courtroom 8 – 4th Floor

25 **Exhibit G**

26 **(Exhibit M to Declaration of Sean F. Rommel)**

27 **[Re: ECF No. 85-3]**

28 **FILED PUBLICLY PER JUDGE KOH'S AUGUST 6, 2014 ORDER
[ECF NO. 180]**

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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION

18 IN RE GOOGLE INC. GMAIL LITIGATION

Master Docket No.: 13-MD-02430-LHK

19 THIS DOCUMENT RELATES TO:
20 ALL ACTIONS

**DECLARATION OF PROPOSED CLASS
COUNSEL SEAN F. ROMMEL IN
SUPPORT OF PLAINTIFFS'
CONSOLIDATED MOTION FOR CLASS
CERTIFICATION**

Date: January 16, 2014
Time: 1:30 p.m.
Judge: Hon. Lucy H. Koh
Place: Courtroom 8—4th Floor

Trial Date: October 20, 2014

26 **Exhibit “M”**
27 **[SUBMITTED UNDER SEAL]**
28

From: Deepak Jindal

Sent:8/27/2009 1:51 PM

To: [-] Claire Cui

Cc: [-] Shiva Shivakumar

Bcc: [-]

Subject: Re: Nemo follow up

Hi Claire,

Thanks for your thoughts. You are absolutely right about email being more focused and the 3 types of emails.

Wondering what your thoughts are on how content and gmail can share granular criteria. For example, I just received a wedding invitation. Instead of showing wedding related ads, if we exposed this info to advertisers, they could show wedding gift, travel ads to me and wedding registry, honeymoon planning etc. to my friend. As far as I understand content is planning broader profile like IBA (~700 buckets), but gmail is planning millions of buckets. Since privacy issues are different for third party data like content vs **google owned data like gmail**, it would be hard for both to use a single user model with the same granularity.

There is another very unique aspect of gmail which is easy to overlook. In gmail, users are in receiving mode. So they would be more likely to browse weekly offers in gmail as compared to when reading an nytimes article. This opens up a whole new set of ad formats and inventory which also require different targeting algorithms.

I will schedule a meeting with you to discuss more.

thx

-d

On Thu, Aug 27, 2009 at 11:52 AM, Claire Cui <claire@google.com> wrote:

Hi Deepak,

The summary below looks great. The first three steps **all seem crucial** for targeting existing ads inventory. I do have a few thoughts about Gmail user profile extraction and user based targeting.

Content-ads team is currently working on targeting ads based on user info. The user info is extracted from user's browsing history in the content network. **I think that Gmail user profile can certainly be complimentary to and likely more accurate than the content-ads user info for better targeting quality.** The key is to filter the daily routine communications and extract the more commercial **user interests**. There are many characteristics of Gmail that we might use for targeting ads.

First, email threads are often more focused than average web pages. A large portion of web page views are from portal pages. Emails are either very topical and focused, or lack of content all together. It is seldom the case where one thread talks about various different topics. **Thus, we could easily find topics (commercial terms, phil clusters, or verticals) that appeared in many email threads, and those topics should show the user's interest.**

Another advantage of Gmail is that it has the email network info, including the sender and receiver of all emails of a user. Using that info, we could cluster the emails into three main categories:

- 1) emails between user and friends and relatives for social purpose**
- 2) emails from businesses (ads, news-letters, promotions, or purchase confirmations)**
- 3) emails between user and professional service providers, often about specific services bid or provided to the user.**

2) and 3) are especially interesting for ad targeting, although we might need to filter some ads that user has no interest in. That can be easily done by looking at the ratio of user viewed emails to all emails from a specific send to see whether the user care about the sender's business or not. For example, I read most of the BabyCenter newsletters but seldom open the promotion email from some other business that somehow got my email address and keeps bombing me with their promotion emails. It also means special interest from the user if he/she clicked links in the email or replied to an email.

Once such user info is collected, Gmail can send them to the content-ads server using special request proto fields that express user info. We don't have such fields yet. But, it can be easily added. The content-ads server can then replace the standard user-info based on user browsing history or combine the two user signals for ad targeting.

As for predicting ad CTR accurately based on user info, content-ads team is working on adding user signals (phil, vertical) into the content-ads SmartASS model.

Hope these ideas can help. I'd be happy to chat more in detail if you like.

Thanks,
Claire

On Mon, Aug 24, 2009 at 5:55 PM, Deepak Jindal<jindal@google.com> wrote:

- > Hi Claire,
- > Just wanted to follow up with on the stuff we talked about last week. Over
- > the weekend I was thinking of the big components of Nemo and I came up with
- > following:
- > 1. Email data extraction + building user profile
- > 2. Targeting existing ads using extracted data per email and to the user
- > profile. Until we have the new ads system, we'll have to continue to target
- > existing ad inventory and even after we have new ads system in place, we'll
- > need to backfill with existing ads.
- > 3. Predicting CTR correctly with new targeting features.
- > 4. New UI for ads and general UI for users to interact with structured data
- > extracted from their email.
- > 5. New Ads system with new targeting criterion, Sales effort to get new ad
- > inventory.
- > I think 1 & 2 are really challenging and 2 would especially benefit from
- > your experience in content ads quality. There is a whole spectrum in 2
- > starting from - showing ads related to the best email in your inbox (instead
- > of the current email) to targeting ads to the user's rich profile. Here are
- > some ideas about what to extract from email:
- > https://docs.google.com/a/google.com/Doc?id=cdhmw52t_6f9bj5xk9
- > Would love to hear your thoughts on this.
- > Deepak.