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5 Attorneys for Third Party  
IPVALUE MANAGEMENT, INC.

6 UNITED STATES DISTRICT COURT  
7  
8 NORTHERN DISTRICT OF CALIFORNIA  
9  
10 SAN FRANCISCO DIVISION

11 GOOGLE, INC., and YOUTUBE, LLC,

12 Plaintiff(s),

13 v.

14 IPVALUE MANAGEMENT INC.,

15 Defendant.

Case No. C11-80016 MISC RS (BZ)

**DECLARATION OF MITCHELL  
ROSENFELD IN SUPPORT OF  
THIRD PARTY IPVALUE  
MANAGEMENT, INC.'S  
OPPOSITION TO GOOGLE, INC.'S  
AND YOUTUBE, LLC'S MOTION TO  
COMPEL PRODUCTION OF  
DOCUMENTS**

1 I, Mitchell Rosenfeld, declare as follows:

2 1. From approximately August 2005 to April 2007, I was employed by  
3 IPVALUE Management, Inc. ("IPVALUE"), and I initially held the position of IP Counsel and  
4 then later the position of Vice President, IP Counsel. I have personal knowledge of the facts set  
5 forth herein, and, if called upon to testify thereto, I am competent to do so and would do so.

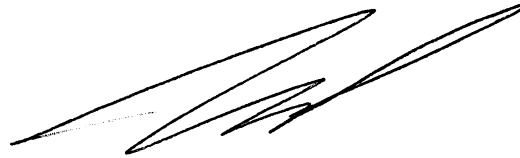
6 2. During the time of my tenure with IPVALUE, IPVALUE's business  
7 consisted of two major components: (1) the identification of patent commercialization  
8 opportunities, and (2) the conduct of the licensing or sales that comprise that commercialization.  
9 These functions were led and primarily conducted by the Operations Group, and the Licensing  
10 Group, respectively. The Operations Group generally included technical and financial  
11 specialists. The Licensing Group focused on license and sale negotiations, and its members were  
12 typically designated as "Vice President, Licensing." or similar titles including the word  
13 "Licensing." The members of the Licensing Group were both attorneys and non-attorneys.

14 3. During my tenure as IP Counsel for IPVALUE my work focused on legal  
15 advice and services to IPVALUE. My duties were to advise and provide services to IPVALUE  
16 regarding legal issues, such as patent infringement theories, and defenses to patent assertion. As  
17 IP Counsel, I was not a member of the Operations Group or the Licensing Group, but during my  
18 tenure I provided legal advice and services to both groups. The vast majority of my duties  
19 included advising and providing services to the company regarding patent issues although I may  
20 have engaged in some non-legal related matters from time-to-time.

21 4. To the best of my recollection, during my tenure with IPVALUE I did not  
22 participate in any licensing negotiation meetings with Google, Inc. or Yahoo, Inc. All work that  
23 I recall performing in relation to Google, Inc. or Yahoo, Inc. involved providing legal advice and  
24 services to IPVALUE.

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I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct. Executed in San Francisco, California on April 6, 2011.



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Mitchell Rosenfeld