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I, Caroline C. Plater declare as follows:

1. I am an attorney at Kelley Drye & Warren LLP, counsel of record for Defendant/Counter-Plaintiff American Blind & Wallpaper Factory, Inc. (“American Blind”) in the above-captioned action. I am a member in good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit A is a true and correct copy of the Stipulated Protective Order entered in this action.

3. Attached hereto as Exhibit B are true and correct copies of documents produced by Plaintiff/Counter-Defendant Google, Inc. (“Google”), with Bates Nos. GOOGLE 19971-19996.

4. Attached hereto as Exhibit C are true and correct copies of documents produced by Google with Bates Nos. GOOGLE 008990-008993.

5. Attached hereto as Exhibit D are true and correct copies of documents produced by Google with Bates Nos. GGE 005313-005314, 005443-005444, 005468-005469, 005531-005533, 005535-005537, 005549-005551, 005571-005572, 005579-005580, 005585-005587, 005606-005607, 005670-005671.

6. Attached hereto as Exhibit E are true and correct copies of documents produced by Google with Bates Nos. GOOGLE 002717-002723.

7. Attached hereto as Exhibit F is a true and correct copy of correspondence from David A. Rammelt to Klaus Hamm, dated November 3, 2005.

8. Attached hereto as Exhibit G is a true and correct copy of correspondence from Klaus Hamm to David A. Rammelt, dated November 8, 2005.

9. Attached hereto as Exhibit H is a true and correct copy of correspondence from David A. Rammelt to Klaus Hamm, dated November 22, 2005.

10. Attached hereto as Exhibit I is a true and correct copy of an e-mail from David A. Rammelt to Klaus Hamm, dated November 29, 2005.

1 11. Attached hereto as Exhibit J is a true and correct copy of correspondence  
2 from Klaus Hamm to David A. Rammelt, dated November 29, 2005.

3 12. Attached hereto as Exhibit K is a true and correct copy of correspondence  
4 from David A. Rammelt to Klaus Hamm, dated November 29, 2005.

5 13. I and other associates and paralegals involved in this case have been  
6 reviewing Google’s production in this case. Thus far, I understand we have identified seven entire  
7 boxes of production, encompassing the bates ranges GOOGLE 10001 - 23369 and GOOGLE  
8 25385 -27523, which contain nothing but third party trademark complaints and related materials  
9 received by Google. I understand that all of these documents are marked as “Confidential -  
10 Attorneys’ Eyes Only.” In addition, Google has identified the bates range GGE 423-56829 as  
11 third party trademark complaints and related materials. We believe that all of these documents are  
12 marked as “Confidential - Attorneys’ Eyes Only.”

13 Executed on December 22, 2005, at Chicago, Illinois.

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct.

16  
17 /s/ Caroline C. Plater  
18 Caroline C. Plater

19  
20 **ATTESTATION OF CONCURRENCE OF FILING**

21 I, Ethan B. Andelman, under penalty of perjury of the laws of the United States of  
22 America, attest that concurrence in the filing of this document has been obtained from each of the  
23 other signatories to this document.

24  
25 /s/ Ethan B. Andelman  
26 Ethan B. Andelman