

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,
a Delaware corporation; CONNEXUS CORP.,
a Delaware corporation; FIRSTLOOK, INC.,
a Delaware corporation; and EPIC MEDIA
GROUP, INC., a Delaware corporation,

Defendants.

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**DECLARATION OF WILLIAM A. DELGADO IN SUPPORT OF
CONNEXUS CORPORATION'S MOTION FOR SUMMARY ADJUDICATION**

I, William A. Delgado, declare as follows:

1. I am over the age of eighteen and am lead counsel for Defendants in this matter. I have personal knowledge of the facts stated herein except where stated on information and belief, and, as to those matters, I believe them to be true.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Answer to Navigation Catalyst Systems, Inc.'s Interrogatory No. 5.

3. Attached as Exhibit B are true and correct copies of relevant excerpts of the deposition transcript of Alan Steremberg, taken July 28, 2010.

4. Attached as Exhibit C are true and correct copies of relevant excerpts of the deposition transcript of Jeffrey Ferguson taken August 4, 2010.

5. Attached as Exhibit D are true and correct copies of relevant excerpts of the deposition transcript of Jeffrey Masters, taken August 3, 2010.

6. Attached as Exhibit E are true and correct copies of relevant excerpts of the deposition transcript of Mavi Llamas, taken September 27, 2010.

7. Attached as Exhibit F are true and correct copies of relevant excerpts of the deposition transcript of Lily Stevenson, taken August 31, 2010.

8. Attached as Exhibit G are true and correct copies of relevant excerpts of the deposition transcript of Seth Jacoby, taken September 15, 2010.

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9. Attached as Exhibit H are true and correct copies of relevant excerpts of the deposition transcript of Christopher Schwerzler, taken December 6, 2010.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of July 2011 at Los Angeles, California.

/s/William A. Delgado
William A. Delgado

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2011, I electronically filed the foregoing paper with the Court using the ECF system which will send notification of such filing to the following:

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