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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, INC., ET AL.,

Plaintiffs,

v.

HATHITRUST, ET AL.,

Defendants.

Case No. 11 Civ. 6351 (HB)

**DECLARATION OF JOSEPH PETERSEN IN FURTHER SUPPORT OF  
DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

I, Joseph Petersen, make the following declaration:

1. I am a member of the Bar of this Court and a partner at the law firm of Kilpatrick Townsend & Stockton LLP, attorneys for the Defendants in the above-captioned action (“Defendants”). I make this Declaration, based on my own personal knowledge, in further support of Defendants’ Motion for Judgment on the Pleadings.
2. Attached as **Exhibit A** is a true and correct copy of Plaintiff The Authors Guild, Inc.’s Responses and Objections to Defendants’ First Set of Requests For Admission.
3. Attached as **Exhibit B** is a true and correct copy of Plaintiff The Authors Guild, Inc.’s Responses and Objections to Defendants’ First Set of Interrogatories and Requests for the Production of Documents.
4. Attached as **Exhibit C** is a true and correct copy of Plaintiff Union des Ecrivaines et des Ecrivains Quebecois’ Responses and Objections to Defendants’ First Set of Requests For Admission.
5. Attached as **Exhibit D** is a true and correct copy of Plaintiff Sveriges Forfattarforbund’s Responses and Objections to Defendants’ First Set of Requests For Admission.
6. Attached as **Exhibit E** is a true and correct copy of Plaintiff Norsk Faglitteraer Forfatter-og Oversetterforening’s Responses and Objections to Defendants’ First Set of Requests For Admission.
7. Attached as **Exhibit F** is a true and correct copy of Plaintiff Authors’ Licensing and Collecting Society’s Responses and Objections to Defendants’ First Set of Requests For Admission.

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

Dated: February 17, 2012

/s/ Joseph Petersen

Joseph Petersen