IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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THE AUTHORS GUILD, INC., et al.,	:	
Plaintiffs,	:	Case No. 11-cv-6351(HB)
v.	:	
HATHITRUST, et al.,	:	
Defendants.	: V	
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DECLARATION OF LAURA GINSBERG ABELSON IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

- I, Laura Ginsberg Abelson, do hereby declare that:
- 1. I am over eighteen years of age and am competent to make this Declaration.
- 2. I am attorney admitted to practice in the State of Maryland, the United States

 District Court for the District of Maryland, and the Fourth Circuit Court of Appeals. I have been admitted *pro hac vice* in this matter.
- 3. Attached hereto as Exhibit A is a true copy of excerpts from the transcript of the Rule30(b)(6) deposition of the Copyright Clearance Center by Fredric L. Haber, its General Counsel, taken on June 4, 2012.
- 4. Attached hereto as Exhibit B is a true copy of excerpts from the transcript of the Rule30(b)(6) deposition of Google, Inc. by Daniel Clancy, Engineering Director, taken on June 1, 2012.
- 5. Attached hereto as Exhibit C is a true copy of excerpts from Objections and Responses of the Individually Named Plaintiffs to Defendant-Intervenors' First Set of Interrogatories and First Request for the Production of Documents, dated May 8, 2012.

6. Attached hereto as Exhibit D is a true copy of the Declaration of Georgina Kleege, dated December 5, 2011, as previously filed in support of Defendant Intervenors'

Motion to Intervene.

7. Attached hereto as Exhibit E is a true copy of the Declaration of Blair Seidlitz, dated December 6, 2011, as previously filed in support of Defendant Intervenors' Motion to

Intervene.

8. Attached hereto as Exhibit F is a true copy of the Declaration of Courtney

Wheeler, dated December 6, 2011, as previously filed in support of Defendant Intervenors'

Motion to Intervene.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Dated: June 29, 2012 /s/ Laura Ginsberg Abelson