

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOFTWARE RIGHTS ARCHIVE, LLC

Plaintiff,

v.

**GOOGLE INC., YAHOO! INC.,
IAC SEARCH & MEDIA, INC., AOL LLC,
and LYCOS, INC.**

Defendants.

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Civil Action No. 2:07-cv-511 (CE)

JURY TRIAL DEMANDED

**DECLARATION OF RAJ DUVVURI IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO DISCLOSE THEIR
NONINFRINGEMENT CONTENTIONS**

I, Raj Duvvuri, declare as follows:

1. I am an attorney licensed to practice in the State of Texas. I am an associate with the law firm of Smyser Kaplan & Veselka, L.L.P., counsel for Software Rights Archive, LLC in this matter. The following facts are within my personal knowledge, and, if called upon to do so, I could and would testify competently thereto.

2. Exhibit 1 to this Motion to Compel Defendants to Disclose Their Noninfringement Contentions is a true and correct copy of excerpts of Plaintiff's First Set of Requests for Admission and Interrogatories dated August 11, 2008.

3. Exhibit 2 to this Motion to Compel Defendants to Disclose Their Noninfringement Contentions is a true and correct copy of Defendant Google Inc.'s responses and Objections to Plaintiff's First Set of Admission (Nos. 1-12) and Interrogatories (Nos. 1-13) dated October 10, 2008.

4. Exhibit 3 to this Motion to Compel Defendants to Disclose Their Noninfringement Contentions is a true and correct copy of Plaintiff's Third Set of Interrogatories dated April 8, 2009.


5. Exhibit 4 to this Motion to Compel Defendants to Disclose Their Noninfringement Contentions is a true and correct copy of a March 27, 2009 letter from Richard S.J. Hung to Victor G. Hardy.

6. Exhibit 5 to this Motion to Compel Defendants to Disclose Their Noninfringement Contentions is a true and correct copy of a July 16, 2009 letter from Rebecca Snavelly Saelao to Victor G. Hardy.

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

Date: May 4, 2010

SMYSER KAPLAN & VESELKA, L.L.P.



Raj Duvvuri
Attorney for Plaintiff
Software Rights Archive, LLC