

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ROSETTA STONE LTD.

Plaintiff,

v.

GOOGLE INC.

Defendant.

CIVIL ACTION NO. 1:09cv736
(GBL / TCB)

DECLARATION OF CORY LOUIE

I, Cory Louie, hereby declare:

1. I am over the age of 18 and serve as Trust & Safety Manager at Google Inc. (“Google”). I have held this position for approximately 3 1/2 years. In my capacity as Trust & Safety Manager, I am responsible for the protection of Google revenue, users and brand. I maintain and advance the trust, safety and security of Google's global products and services by managing significant risk, abuse and fraud issues through investigations, education, enforcement and collaboration. I am familiar with Google's overall efforts to manage risk, abuse fraud, security and enforcement issues. I am also familiar with various advertising services offered by Google, including the Google AdWords program (“AdWords”). Except where otherwise indicated, the following is based on personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. One of my responsibilities as Trust and Safety Manager is to address the source of risk, abuse, fraud issues on a wide range of Google products and services, including the distribution of counterfeit goods and developing strategy to identify individuals or groups conducting the activity using Google AdWords and disrupt their efforts.

3. [REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. Executed on
March 26, 2010.



Cory Louie