

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

BID FOR POSITION, LLC,

Plaintiff,

v.

AOL LLC, GOOGLE INC., MICROSOFT
CORP., and MIVA, INC.,

Defendants.

CASE NO. 2:07-cv-582 JBF/TEM

**DECLARATION OF KATHERINE H. BENNETT
IN SUPPORT OF DEFENDANT GOOGLE INC.'S REPLY IN SUPPORT OF ITS MOTION
FOR A PROTECTIVE ORDER BARRING PLAINTIFF'S 30(B)(6) NOTICE AND
DEPOSITION NOTICES BEYOND THE 10-DEPOSITION RULE**

I, Katherine H. Bennett, declare and state as follows:

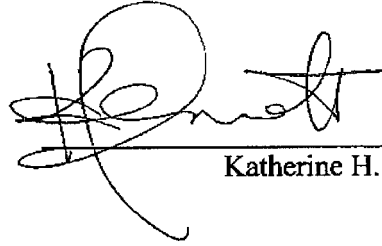
1. I am an associate of the law firm Quinn Emanuel Urquhart Oliver & Hedges, LLP and represent Defendant Google Inc. ("Google") in this action.
2. This declaration is made in support of Defendant Google Inc.'s Reply in Support of Its Motion for a Protective Order Barring Plaintiff's 30(b)(6) Notice and Deposition Notices Beyond the 10-Deposition Rule.
3. The parties had previously agreed that both the personal and 30(b)(6) depositions of Shane Antos would proceed on July 2. Plaintiff, however, waited until the day of Mr. Antos' deposition to inform Google that it would forego his personal deposition and proceed only with the 30(b)(6) deposition. Had Plaintiff informed Google of this sooner, Google would have arranged the deposition of Guemmy Kim on that same date, saving both parties' time and resources.
4. Attached hereto as Exhibit 1 is a true and accurate copy of an e-mail from David Rosen to David Perlson and Greg Dovel sent on July 14, 2008.

5. Attached hereto as Exhibit 2 is a true and accurate copy of an e-mail from David Rosen to David Perlson and Emily O'Brien sent on July 3, 2008.

6. Attached hereto as Exhibit 3 is a true and accurate copy of Defendants' Notice of 30(b)(6) Deposition to Plaintiff Bid for Position, LLC dated July 2, 2008.

I hereby affirm, under the penalty of perjury of the laws of the United States, that the foregoing statements are true and correct.

Dated: July 14, 2008

A handwritten signature in black ink, appearing to read "K. Bennett", written over a horizontal line.

Katherine H. Bennett

Dated: July 14, 2008

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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