

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

I/P ENGINE, INC.

Plaintiff,

v.

AOL INC., *et al.*,

Defendants.

Civil Action No. 2:11-cv-512

**DECLARATION OF HOWARD CHEN IN SUPPORT OF
DEFENDANTS' MOTION FOR LEAVE TO SUBMIT EVIDENCE AND OFFER OF
PROOF IN SUPPORT OF DEFENDANTS' OPENING BRIEF ON ISSUES RAISED IN
THE COURT'S AUGUST 14 ORDER**

I, Howard Chen declare:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendants AOL Inc., Google Inc., Target Corporation, IAC Search & Media, Inc. and Gannett Co., Inc. (collectively, "Defendants") in the above-captioned case. I provide this declaration upon personal knowledge and, if called upon as a witness, would testify competently as to the matters recited herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the October 29, 2013 Declaration of Defendants' Expert Lyle H. Ungar, Ph.D., Concerning "New AdWords" Functionality.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the September 20, 2013 deposition in this matter of Bartholomew Furrow.

4. Attached hereto as Exhibit 3 is a true and correct copy of the October 28, 2013 Declaration of Defendants' Expert Keith R. Ugone, Ph.D. Concerning Post-Judgment Royalties and Exhibits 2 and 3 thereto. Exhibit 1 can be found at D.N. 468-4.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day October, at San Francisco, California.



Howard. Chen

DATED: October 30, 2013

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2013, 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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