

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 JOSHUA SOHN IN SUPPORT OF DEFENDANTS' OPENING
CLAIM CONSTRUCTION BRIEF**

I, Joshua Sohn, declare as follows:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendants IAC Search & Media, Inc., Gannett Co., Inc., Target Corporation, and Google Inc. 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 A is a true and correct copy of U.S. Patent No. 6,314,420 ("the '420 Patent").

3. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 6,775,664 ("the '664 Patent").

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiff's Preliminary Proposed Claim Terms and Proposed Constructions, dated March 21, 2012.

5. Attached hereto as Exhibit D is a true and correct copy of Plaintiff's Objections and Responses to Google's Third Set of Interrogatories, dated March 22, 2012.

6. Attached hereto as Exhibit E is a true and correct copy of an email from Plaintiff's counsel Charles Monterio to Defendants' counsel, dated April 11, 2012.

7. Attached hereto as Exhibit F is a true and correct copy of another email from Plaintiff's counsel Charles Monterio to Defendants' counsel, dated April 11, 2012.

8. Attached hereto as Exhibit G is a true and correct copy of a letter from Plaintiff's counsel Charles Monterio to Defendants' counsel David Perlson, dated April 5, 2012.

9. Attached hereto as Exhibit H is a true and correct copy of an excerpt from the prosecution history of the '420 Patent.

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

Dated: April 12, 2012



Joshua Sohn

DATED: April 12, 2012

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2012, 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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