

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 JENNIFER J. GHAUSSY IN SUPPORT OF DEFENDANTS’
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Jennifer J. Ghaussy, 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 Defendants’ Proposed Constructions for Claim Terms and Elements, dated March 21, 2012.

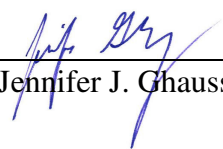
3. Attached hereto as **Exhibit B** is a true and correct copy of selected pages of WEBSTER’S NEW WORLD DICTIONARY OF COMPUTER TERMS (8th Ed. 2000).

4. Attached hereto as **Exhibit C** is a true and correct copy of an email from Defendants' counsel Joshua Sohn to Plaintiff's counsel Charles Monterio and a response email from Charles Monterio to Joshua Sohn, both dated April 10, 2012.

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

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

Dated: May 3, 2012



Jennifer J. Ghaussy

Dated: May 3, 2012

By: /s/ Stephen E. Noona

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