## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

I/P	<b>ENGI</b>	NE,	INC.

Plaintiff,

v.

Civil Action No. 2:11-cv-512

AOL, INC., et al.,

Defendants.

## <u>DECLARATION OF JENNIFER J. GHAUSSY IN SUPPORT OF DEFENDANTS'</u> 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 (8<sup>th</sup> 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

Jehnifer J. Chaussy

Dated: May 3, 2012

By: /s/ Stephen E. Noona

Stephen E. Noona

KAUFMAN & CANOLES, P.C.

150 West Main Street

Post Office Box 3037

Norfolk, VA 23514

Telephone: (757) 624.3000 Facsimile: (757) 624.3169

David A. Perlson

QUINN EMANUEL URQUHART &

SULLIVAN LLP

50 California Street, 22nd Floor

San Francisco, CA 94111

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Counsel for Defendants GOOGLE INC., IAC SEARCH & MEDIA, INC., TARGET CORP., and

GANNETT COMPANY, INC.

By: /s/ Stephen E. Noona

Stephen E. Noona

KAUFMAN & CANOLES, P.C.

150 West Main Street

Post Office Box 3037

Norfolk, VA 23514

Telephone: (757) 624.3000

Facsimile: (757) 624.3169

Robert L. Burns

FINNEGAN, HENDERSON, FARABOW,

GARRETT & DUNNER, LLP

Two Freedom Square

11955 Freedom Drive

Reston, VA 20190

Telephone: (571) 203-2700

Facsimile: (202) 408-4400

Cortney S. Alexander

FINNEGAN, HENDERSON, FARABOW,

GARRETT & DUNNER, LLP

3500 SunTrust Plaza

303 Peachtree Street, NE

Atlanta, GA 94111 Telephone: (404) 653-6400 Facsimile: (415) 653-6444

Counsel for Defendant AOL, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 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:

Jeffrey K. Sherwood Kenneth W. Brothers DICKSTEIN SHAPIRO LLP 1825 Eye Street NW Washington, DC 20006 Telephone: (202) 420-2200 Facsimile: (202) 420-2201 sherwoodj@dicksteinshapiro.com brothersk@dicksteinshapiro.com

Counsel for Plaintiff, I/P Engine, Inc.

Stephen E. Noona Virginia State Bar No. 25367 KAUFMAN & CANOLES, P.C. 150 W. Main Street, Suite 2100 Norfolk, VA 23510-1665 Telephone: (757) 624-3239 Facsimile: (757) 624-3169 senoona@kaufcan.com

Counsel for AOL Inc., Google, Inc., Gannett Co., Inc., Target Corporation and IAC Search & Media, Inc.

/s/ Stephen E. Noona

Stephen E. Noona Virginia State Bar No. 25367 KAUFMAN & CANOLES, P.C. 150 West Main Street, Suite 2100 Norfolk, VA 23510

Telephone: (757) 624-3000 Facsimile: (757) 624-3169 senoona@kaufcan.com

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