

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 GHAUSSY IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFF’S MOTION FOR LEAVE TO TAKE 30(B)(1)
DEPOSITIONS**

I, Jennifer Ghaussy, declare as follows:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendants Google Inc., IAC Search & Media, Inc., Target Corporation, and Gannett Co., 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 an email chain between Margaret Kammerud, David Perlson, and Kenneth Brothers, dated December 7, 2011 through January 31, 2012.

3. Attached hereto as Exhibit B is a true and correct copy of an email chain between Stephen Noona, David Perlson, Margaret Kammerud, and Kenneth Brothers, dated January 30, 2012 through February 9, 2012.
4. Attached hereto as Exhibit C is a true and correct copy of Plaintiff I/P Engine, Inc.'s Notice of Deposition of Derek Cook, dated May 11, 2012.
5. Attached hereto as Exhibit D is a true and correct copy of a letter from myself to Dawn Albert, dated May 16, 2012.
6. Attached hereto as Exhibit E is a true and correct copy of a letter from Charles Monterio to myself, dated May 22, 2012.
7. Attached hereto as Exhibit F is a true and correct copy of a letter from myself to Charles Monterio, dated May 23, 2012.
8. Attached hereto as Exhibit G is a true and correct copy of a letter from Charles Monterio to Emily O'Brien, dated May 29, 2012.
9. Attached hereto as Exhibit H is a true and correct copy of a letter from myself to Charles Monterio, dated May 31, 2012.
10. Attached hereto as Exhibit I is a true and correct copy of a letter from Charles Monterio to myself, dated June 5, 2012.
11. Attached hereto as Exhibit J is a true and correct copy of a letter from myself to Charles Monterio, dated June 8, 2012.
12. Attached hereto as Exhibit K is a true and correct copy of a chain of emails between Dawn Albert, Charles Monterio, and Emily O'Brien, dated June 13 and 14, 2012.
13. Attached hereto as Exhibit L is a true and correct copy of a letter from Charles Monterio to Emily O'Brien, dated June 19, 2012.

14. Attached hereto as Exhibit M is a true and correct copy of an email chain between myself, Emily O'Brien and Charles Monterio, dated June 19 through 21, 2012.
15. Attached hereto as Exhibit N is a true and correct copy of a chain of emails between David Perlson and Charles Monterio, dated June 25, 2012
16. Attached hereto as Exhibit O is a true and correct copy of a letter from myself to Charles Monterio, dated April 23, 2012.
17. Attached hereto as Exhibit P is a true and correct copy of a letter from myself to Charles Monterio, dated April 27, 2012.
18. Attached hereto as Exhibits Q, R, and S are true and correct copies of IAC Search's, Target's, and Gannett's Objections and Responses to Plaintiff's Liability 30(b)(6) Notices.
19. Attached hereto as Exhibits T, U, and V are true and correct copies of IAC Search's, Target's and Gannett's Objections and Responses to Plaintiff's Damages 30(b)(6) Notices.
20. Attached hereto as Exhibit W is a true and correct copy of a letter from Charles Monterio to David Perlson, dated April 26, 2012.
21. On July 2, 2012, Plaintiff served "third preliminary" infringement contentions for certain of the accused products. In none of these infringement contentions did Plaintiff cite to the June 21, 2012 deposition of Google 30(b)(6) designee Jonathan Alferness.
22. I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: July 5, 2012



Jennifer Ghaussy

DATED: July 5, 2012

/s/ Stephen E. Noona

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Counsel for Defendant AOL, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 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 all counsel of record.

/s/ Stephen E. Noona
Stephen E. Noona