

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 GOOGLE AND IAC  
SEARCH'S MOTION FOR RULE 37 SANCTIONS FOR I/P ENGINE'S VIOLATION  
OF MAY 2, 2012 COURT ORDER**

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. ("Google") and IAC Search & Media, Inc. ("IAC Search") 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 the parties' stipulation of November 4, 2011.

3. Attached hereto as Exhibit B is a true and correct copy of a letter from David Perlson to Charles Monterio dated February 13, 2012.

4. As of January 18, 2012, IAC Search produced almost 20,000 pages of documents regarding ASL and IAC Search's use of AdSense for Search. This production, and Google's December 7 production, included technical specifications, design requirements and other technical documentation.

5. On May 11, 2012, Google produced the custodial documents of Bryan Horling, who was listed in Google's initial disclosures as a Google employee with knowledge of the accused features of Google Search, and by May 31, Google had produced the documents of the nine custodians agreed upon by the parties.

6. By June 15, 2012, IAC Search had completed its custodial production, including the documents of James Speer, listed in the initial disclosures as a person with knowledge of the accused features of Ask Sponsored Listings.

7. After correspondence and several meet and confers, Plaintiff agreed to supplement its November 2011 infringement contentions no later than February 17, 2012. On February 17, Plaintiff served its supplemental infringement contentions. These contentions included supplementations for Google AdWords and AdSense for Search, the other defendants' use of AdSense for Search, and AOL Sponsored Listings. Plaintiff's infringement contentions, however, did not include a supplementation for Google Search or IAC Search's Ask Sponsored Listings as Plaintiff had agreed to provide.

8. Attached hereto as Exhibit C is a true and correct copy of a letter from myself to Charles Monterio dated July 5, 2012.

9. Attached hereto as Exhibit D is a true and correct copy of a letter from myself to Charles Monterio dated July 10, 2012.

10. Attached hereto as Exhibit E is a true and correct copy of an email from David Perlson to Charles Monterio dated July 10, 2012.

11. Attached hereto as Exhibit F is a true and correct copy of Plaintiff I/P Engine, Inc.'s First Liability Rule 30(b)(6) Notice of Deposition of Defendant IAC Search and Media, Inc., dated April 2, 2012.

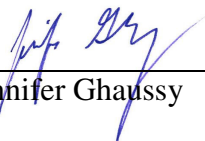
12. Attached hereto as Exhibit G is a true and correct copy of Plaintiff I/P Engine, Inc.'s First Amended Liability Rule 30(b)(6) Notice of Deposition of Defendant IAC Search and Media, Inc., dated June 12, 2012.

13. Attached hereto as Exhibit H is a true and correct copy of Plaintiff I/P Engine, Inc.'s First Liability Rule 30(b)(6) Notice of Deposition of Defendant Google Inc., dated April 2, 2012.

14. Attached hereto as Exhibit I is a true and correct copy of Plaintiff I/P Engine, Inc.'s First Amended Liability Rule 30(b)(6) Notice of Deposition of Defendant Google Inc., dated June 12, 2012.

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

Dated: July 13, 2012

  
\_\_\_\_\_  
Jennifer Ghaussy

DATED: July 13, 2012

/s/ Stephen E. Noona

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/s/ David A. Perlson

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*Counsel for GOOGLE INC. and  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 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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