

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 BARTHOLOMEW FURROW IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

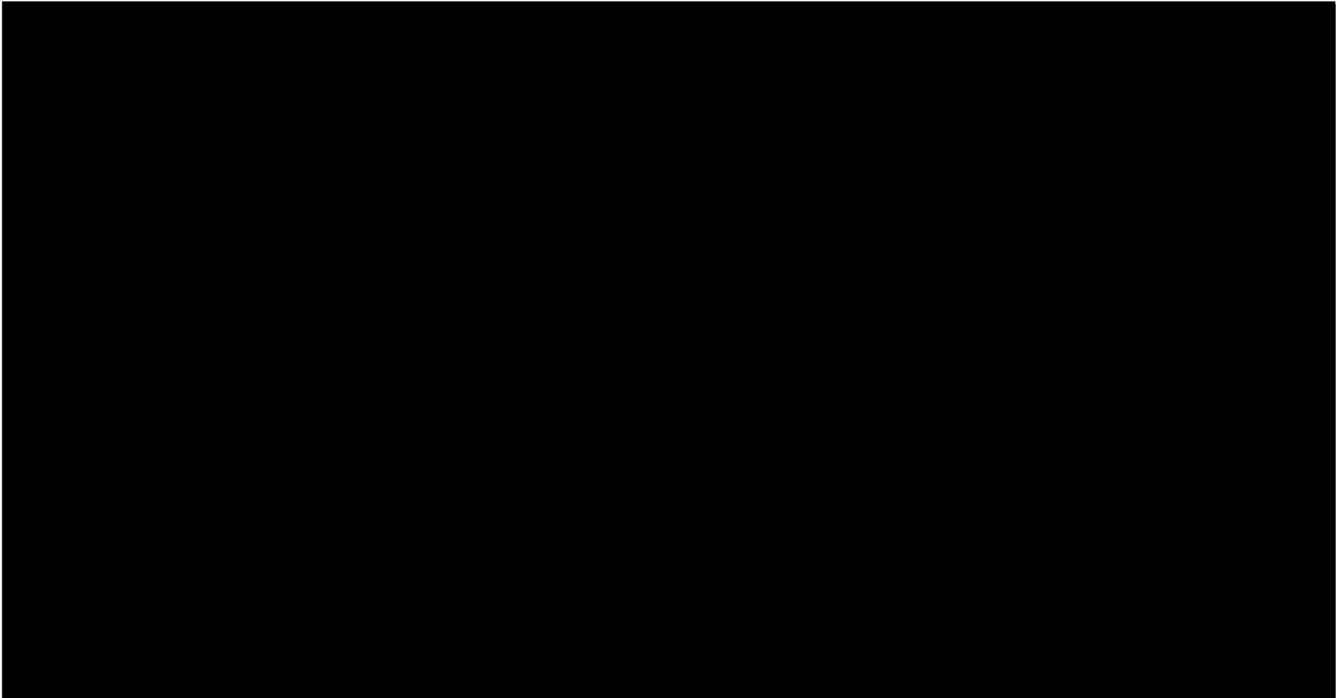
I, Bartholomew Furrow, declare and state as follows:

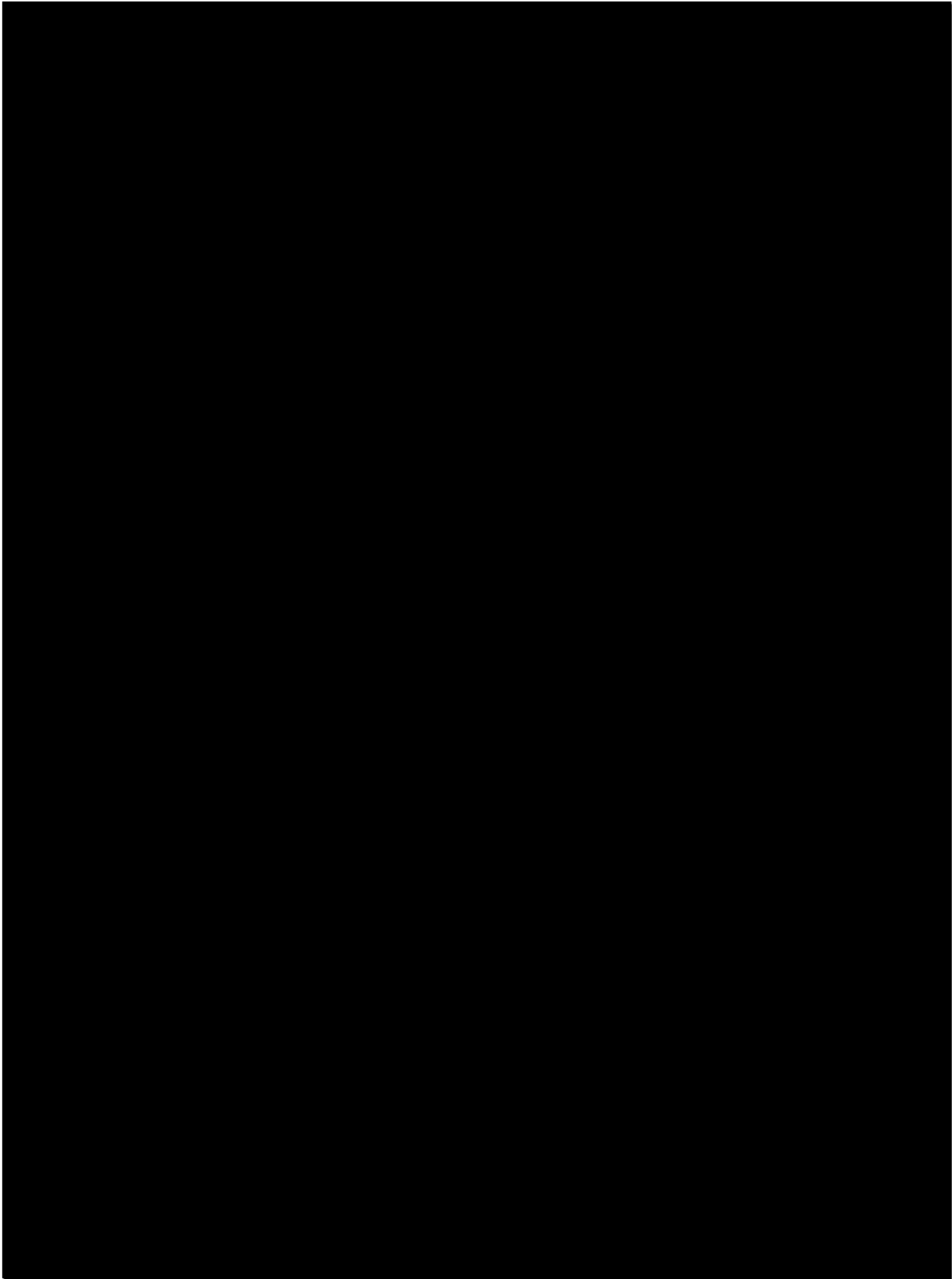
1. I am a staff software engineer at Google Inc. (“Google”), working as part of the Ads Quality Team. I make this declaration in support of Defendants’ Motion for Summary Judgment. The matters referred to in this declaration are based upon my personal knowledge, and if called as a witness I could testify competently to those matters.

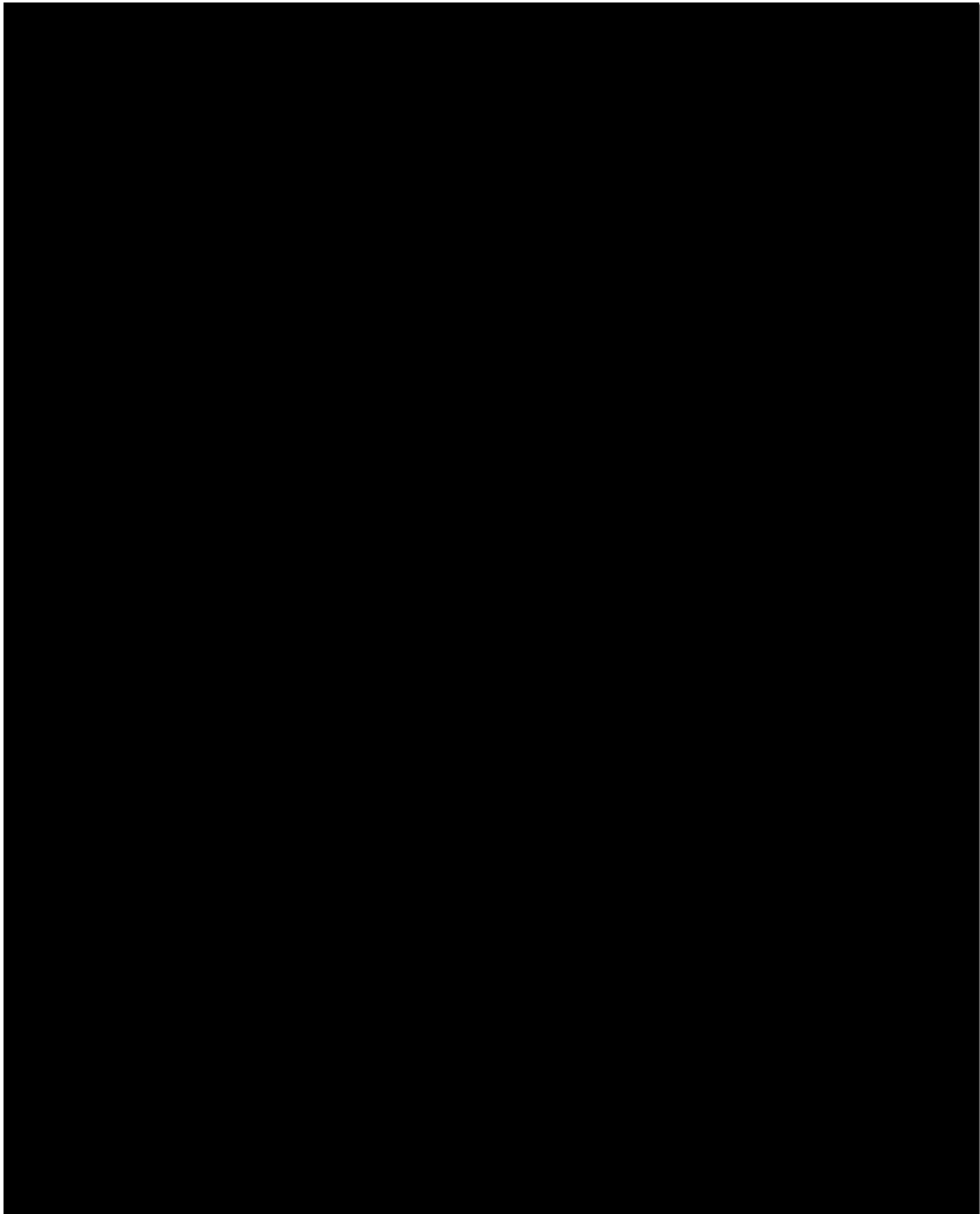
2. I have been a software engineer at Google since September 2006. Among other things, I have had significant responsibilities related to Google’s Smart Ad Selection System (“Smart Ads”), including writing source code and reviewing source code written by others. At Google, I have worked in the Smart Ads and Thresholds teams which are part of the Ads Quality team.

3. During my time working within the Ads Quality team, I have become intimately familiar with the operation of the AdWords system.

4. In this lawsuit, I understand that Plaintiff is accusing AdWords, AdSense for Search and AdSense for Mobile Search of patent infringement. I am familiar with these products and their operations described in this declaration.







I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 12 day of September, 2012 in Mountain View, California.



Bartholomew Furrow

DATED: September 12, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 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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