

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 JOSHUA L. SOHN IN SUPPORT OF
DEFENDANTS' MOTIONS IN LIMINE

I, Joshua L. Sohn, declare as follows:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendant Google Inc. ("Google") 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 Plaintiff's Updated Initial Disclosures, dated August 8, 2012.

3. Attached hereto as **Exhibit B** is a true and correct copy of an email from Plaintiff's counsel Charles Monterio to Defendants' counsel, dated August 27, 2012.

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter from Defendants' counsel Margaret Kammerud to Charles Monterio, dated August 9, 2012.
5. Attached hereto as **Exhibit D** is a true and correct copy of an email from Defendants' counsel Emily O'Brien to Charles Monterio, dated August 22, 2012.
6. Attached hereto as **Exhibit E** is a true and copy of excerpts from the Rebuttal Expert Report of Dr. Jaime Carbonell Regarding Validity, dated August 29, 2012.
7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the Deposition Transcript of Nicholas Fox, dated September 12, 2012.
8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from the Deposition Transcript of Jonathan Diorio, dated September 18, 2012.
9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts from the Deposition Transcript of Jonathan Alferness, dated June 21, 2012.
10. Attached hereto as **Exhibit I** is a true and correct copy of excerpts from the Deposition Transcript of Stephen L. Becker, PhD, dated September 8, 2012.
11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts from the Deposition Transcript of Keith Raymond Ugone, PhD, dated September 14, 2012.

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

Dated: September 21, 2012



Joshua L. Sohn

DATED: September 21, 2012

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 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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