

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’  
MOTION TO PRECLUDE DR. OPHIR FRIEDER FROM TESTIFYING REGARDING  
UNTIMELY OPINIONS THAT WERE NOT DISCLOSED IN HIS ORIGINAL EXPERT  
REPORT AND OPINIONS THAT HE NOW CONCEDES ARE INCORRECT**

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 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 an email exchange between Jen Ghaussy and Charles Monterio et al. spanning July 10 through July 12, 2012.
3. Attached hereto as Exhibit B is a true and correct copy of a letter from Charles J. Monterio, Jr. to Emily O'Brien dated June 27, 2012.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiff I/P Engine, Inc.'s Notice of Deposition of Bartholomew Furrow dated July 9, 2012.
5. Attached hereto as Exhibit D is a true and correct copy of an email exchange between Jen Ghaussy and Charles Monterio et al. spanning July 9 through July 19, 2012.
6. Attached hereto as Exhibit E is a true and correct copy of Plaintiff I/P Engine, Inc.'s Notice of Deposition of Gary Holt dated August 8, 2012.
7. Exhibit F was intentionally omitted.
8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the September 6, 2012 deposition of Ophir Frieder, Ph.D.
9. Attached hereto as Exhibit H is a true and correct copy of excerpts from the June 21, 2012 deposition of Jonathan Glen Alferness.

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

Dated: September 21, 2012

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

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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