

**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.

5. Google offers a variety of services that can be accessed by anyone with an Internet connection and an Internet browser. A user accessing www.google.com may input a search query, and Google will return search results (e.g., web pages, videos or images). Additionally, for some queries, Google serves targeted advertisements to the right of (or sometimes above or below) search results.

6. AdWords is the online advertising auction system used to display advertisements next to search results on www.google.com. Some third-party and Google-owned websites (e.g., Google Maps, and the search function for the online auction site eBay) show advertisements provided by a Google system called AdSense For Search ("AFS"). Those websites typically show AFS-provided ads on the "result" page for a search function.

7. Each time an end user enters a search query on Google.com, AdWords runs an auction for the ad space available on the search results page displayed to the end user. To enter the auction, advertisers submit an advertisement, identify keywords they wish to associate with the advertisement, and provide their bid: the maximum cost-per-click, which indicates the maximum price the advertiser is willing to pay if an end-user clicks on the ad.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

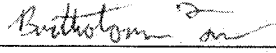
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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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