

# Exhibit A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

I/P ENGINE, INC.,	)	
	)	
Plaintiff,	)	
v.	)	Civ. Action No. 2:11-cv-512
	)	
AOL, INC. et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF MARK BLAIS**

I, Mark Blais, declare under penalty of perjury as follows:

1. I am over the age of 18, am competent, and have personal knowledge and am prepared to testify of the matters stated herein.
2. I joined the Lycos legal department in January 2005, and have been with the Lycos legal department since that time. I currently am General Counsel of Lycos.
3. In 2005, no one in the Lycos legal department had any knowledge of the PX 176, a Google blog post dated July 18, 2005. In 2005, the Lycos legal department was focused upon disputes relating to the recent purchase of that part of the company by a South Korean company, Daum Communications. Those disputes were between Daum and Telefonica, the prior owner of the Lycos. The Lycos legal department also was focused on trying to avert bankruptcy, settling a large piece of litigation with Yahoo!, Inc., and resolving a dispute with Carnegie Mellon University over ownership of the Lycos trademark. At no point in 2005 did I discuss with any other person either inside the Lycos legal department or with anyone else from Lycos either the

Google blog post (PX 176), or anything else regarding the internal operation of Google's Adwords system.

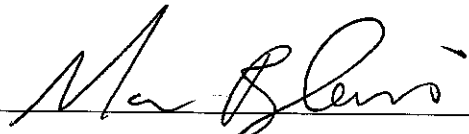
4. To the best of my knowledge, no one at the Lycos legal department had any knowledge of the internal operation of Google's Adwords system in 2005.

5. I have reviewed PX 176. In my opinion, that blog post does not provide information regarding the internal operation of Google's Adwords system that would have caused me to commence an investigation into whether Google's Adwords system infringed the '420 or '664 patents. The relevant portion of PX 176 is a single sentence that does not reveal any technical details of the operation of the Adwords system. It does not say that Google combines, or filters, or otherwise performs any of the steps in either claim 10 of the '420 patent or claim 1 of the '664 patent.

6. To the best of my knowledge, and as I testified to during my deposition on July 31, 2012, Lycos was not using AdSense For Search or Google's Sponsored Listings in 2005. Lycos used AdSense For Content from 2002 to 2004. It indirectly began using Google's Sponsored Links through Ask.com from 2006 to 2007. Lycos would have had no reason to read PX176 in 2005, and I am not aware of anyone having done so.

Further your declarant sayeth naught.

Dated: October 31, 2012

  
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