

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 MARGARET KAMMERUD IN SUPPORT OF GOOGLE'S  
MOTION TO COMPEL PLAINTIFF TO PROVIDE CONCEPTION, REDUCTION-TO-  
PRACTICE, AND PRIORITY DATE INFORMATION FOR THE PATENTS-IN-SUIT**

I, Margaret P. Kammerud, 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. 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 Objections and Responses to Google's First Set of Interrogatories, dated December 7, 2011.

3. Attached hereto as **Exhibit B** is a true and correct copy of a letter from myself to Plaintiff's counsel Ken Brothers, dated December 13, 2011.

4. Attached hereto as **Exhibit C** is a true and correct copy of an email from Ken Brothers to Google counsel David Perlson and myself, dated December 19, 2011.

5. Attached hereto as **Exhibit D** is a true and correct copy of an email from David Perlson to Ken Brothers, dated December 20, 2011.

6. On December 22, 2011, the parties engaged in telephonic meet-and-confer regarding Plaintiff's responses to Google's Interrogatory No. 1 and No. 9. David Perlson, Jennifer Ghaussy, and myself participated in this meet-and-confer on behalf of Google, while Ken Brothers and Charles Monterio participated on behalf of Plaintiff. During this meet-and-confer, Mr. Brothers stated that Plaintiff would not be able to give a complete response to Google's Interrogatory No. 1 until it could review documents produced by third-party Lycos, Inc., in response to a subpoena served by Google. During this meet-and-confer, Mr. Brothers also stated that Plaintiff's current contention is that the priority date for the patents-in-suit is December 3, 1998, but that Plaintiff had not decided whether it would rely on earlier patent applications to pursue an earlier priority date.

7. Attached hereto as **Exhibit E** is a true and correct copy of a letter from Plaintiff counsel Charles Monterio to David Perlson, dated January 10, 2012.

8. Attached hereto as **Exhibit F** is a true and correct copy of an email from Google counsel Joshua Sohn to Ken Brothers, dated February 8, 2012.

9. Attached hereto as **Exhibit G** is a true and correct copy of a letter from Charles Monterio to Joshua Sohn, dated February 9, 2012.

10. Attached hereto as **Exhibit H** is a true and correct copy of Defendants' Preliminary Invalidity Contentions, dated January 24, 2012.

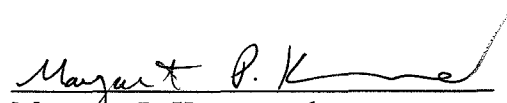
11. Attached hereto as **Exhibit I** is a true and correct copy of an email from Armands Chagnon, senior paralegal for Plaintiff's counsel, conveying to Google's counsel the document production of Andrew Lang, named inventor of the patents-in-suit.

12. Attached hereto as **Exhibit J** is a true and correct copy of an email from Ken Brothers to myself, dated February 1, 2012.

13. Attached hereto as **Exhibit K** is a true and correct copy of a letter from Lycos counsel Mark Blais to Joshua Sohn, dated January 10, 2012.

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

Dated: February 13, 2012

  
Margaret P. Kammerud

DATED: February 13, 2012

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 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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*/s/ Stephen E. Noona*

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