

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 HOWARD CHEN IN SUPPORT OF DEFENDANTS' REPLY
BRIEFS IN SUPPORT OF DEFENDANTS' RENEWED MOTIONS FOR JUDGMENT
AS A MATTER OF LAW**

I, Howard Chen, declare as follows:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendants Google Inc., IAC Search & Media, Inc., Gannett Co., Inc., AOL, Inc. and Target Corp. 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 1 is a true and correct copy of the transcript of the deposition testimony of AOL's 30(b)(6) witness Mr. Hickernell played in open court during the jury trial in the above-captioned matter.

3. Attached hereto as Exhibit 2 is a true and correct copy of selected portions of the Advance Pretrial Order served on the Court on October 5, 2012.

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

Dated: February 15, 2013



Howard Chen

DATED: February 15, 2013

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2013, 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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