

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 DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S MOTION FOR POST-JUDGMENT ROYALTIES**

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 1 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220751 through G-IPE-0220757.

3. Attached hereto as Exhibit 2 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000103 through LYCOS 0000117.

4. Attached hereto as Exhibit 3 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000028 through LYCOS 0000038.

5. Attached hereto as Exhibit 4 is a true and correct copy of the document produced by Lycos, Inc. under Bates ranges LYCOS 0000039 through LYCOS 0000102 and LYCOS 0000026 through LYCOS 0000027.

6. Attached hereto as Exhibit 5 is a true and correct copy of the document produced by I/P Engine, Inc. under Bates range IPE 0032797 through IPE 0032817.

7. Attached hereto as Exhibit 6 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000947 through LYCOS 0000954.

8. Attached hereto as Exhibit 7 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000735 through LYCOS 0000740.

9. Attached hereto as Exhibit 8 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000741 through LYCOS 0000745.

10. Attached hereto as Exhibit 9 is a true and correct copy of the document produced by I/P Engine, Inc. under Bates range IPE 0022880 through IPE 0022885.

11. Attached hereto as Exhibit 10 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220532 through G-IPE-0220546.

12. Attached hereto as Exhibit 11 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220814 through G-IPE-0220820.

13. Attached hereto as Exhibit 12 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220871 through G-IPE-0220875.

14. Attached hereto as Exhibit 13 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0888288 through G-IPE-0888295.

15. Attached hereto as Exhibit 14 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220832 through G-IPE-0220842.

16. Attached hereto as Exhibit 15 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0220821 through G-IPE-0220831.

17. Attached hereto as Exhibit 16 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0888883 through G-IPE-0888896.

18. Attached hereto as Exhibit 17 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0888296 through G-IPE-0888306.

19. Attached hereto as Exhibit 18 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0888898 through G-IPE-0888899.

20. Attached hereto as Exhibit 19 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0888901 through G-IPE-0888902.

21. Attached hereto as Exhibit 20 is a true and correct copy of the document produced by Google, Inc. under Bates range G-IPE-0559880 through G-IPE-0559882.

22. Attached hereto as Exhibit 21 is a true and correct copy of the document produced by Lycos, Inc. under Bates range LYCOS 0000947 through LYCOS 0000954.

23. Attached hereto as Exhibit 22 is a true and correct copy of portions of the September 8, 2012 deposition of Dr. Stephen Becker.

24. Attached hereto as Exhibit 23 is a true and correct copy of portions of the August 31, 2012 deposition of Mark Blais.

25. Attached hereto as Exhibit 24 is a true and correct copy of Plaintiff's trial demonstratives PDX-071, PDX-072, and PDX-076.

26. Attached hereto as Exhibit 25 is a true and correct copy of the May 3, 2013 Office Action in *Ex Parte* Reexamination of U.S. Patent No. 6,314,420.

27. Attached hereto as Exhibit 26 is a true and correct copy of the March 7, 2013 Decision Granting *Ex Parte* Reexamination of U.S. Patent No. 6,775,664.

28. Attached hereto as Exhibit 27 is a true and correct copy of the April 17, 2013 Stipulation between the parties found at D.N. 932.

29. Attached hereto as Exhibit 28 is a true and correct copy of portions of Google's 2012 Form10-K as filed with the U.S. Securities and Exchange Commission.

30. Attached hereto as Exhibit 29 is a true and correct copy of an email sent by David Perlson to Plaintiff's counsel on April 17, 2013.

31. Attached hereto as Exhibit 30 is a true and correct copy of the May 10, 2013 Office Action in *Ex Parte* Reexamination of U.S. Patent No. 6,775,664.

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

Dated: May 13, 2013



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Margaret P. Kammerud

DATED: May 13, 2013

/s/ Stephen E. Noona

Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
senoona@kaufcan.com

David Bilsker  
David A. Perlson  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700  
davidbilsker@quinnemanuel.com  
davidperlson@quinnemanuel.com

*Counsel for Google Inc., Target Corporation, IAC  
Search & Media, Inc., and Gannett Co., Inc.*

/s/ Stephen E. Noona

Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169

Robert L. Burns  
FINNEGAN, HENDERSON, FARABOW, GARRETT &  
DUNNER, LLP  
Two Freedom Square  
11955 Freedom Drive  
Reston, VA 20190  
Telephone: (571) 203-2700  
Facsimile: (202) 408-4400

Cortney S. Alexander  
FINNEGAN, HENDERSON, FARABOW, GARRETT &  
DUNNER, LLP  
3500 SunTrust Plaza  
303 Peachtree Street, NE

Atlanta, GA 94111  
Telephone: (404) 653-6400  
Facsimile: (415) 653-6444

*Counsel for Defendant AOL Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 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:

Jeffrey K. Sherwood  
Kenneth W. Brothers  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
sherwoodj@dicksteinshapiro.com  
brothersk@dicksteinshapiro.com

Donald C. Schultz  
W. Ryan Snow  
Steven Stancliff  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 West Main Street, Suite 1500  
Norfolk, VA 23510  
Telephone: (757) 623-3000  
Facsimile: (757) 623-5735  
dschultz@cwm-law.com  
wrsnow@cwm-law.com  
sstancliff@cwm-law.com

*Counsel for Plaintiff, I/P Engine, Inc.*

/s/ Stephen E. Noona  
Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
senoona@kaufcan.com