

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

I/P ENGINE, INC.

Plaintiff,

v.

AOL, INC.,
GOOGLE INC.,
IAC SEARCH & MEDIA, INC.,
GANNETT COMPANY, INC., and
TARGET CORPORATION,

Defendants.

Civil Action No. 2:11-cv-512

**DECLARATION OF MARGARET P. KAMMERUD IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF I/P ENGINE, INC.'S NOTICE OF
CALCULATION OF SUPPLEMENTAL DAMAGES, PREJUDGMENT INTEREST AND
POST-JUDGMENT INTEREST**

I, Margaret P. Kammerud, declare as follows:

1. I am an attorney with Quinn, Emanuel, Urquhart & Sullivan, LLP, outside counsel for Defendants AOL, Inc., Google Inc., IAC Search & Media, Inc., Gannett Co., Inc., and Target Corporation. I make this declaration in support of Defendants' Opposition to Plaintiff I/P Engine, Inc.'s Notice of Calculation of Supplemental Damages, Prejudgment Interest and Post-Judgment Interest. 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. Exhibit A is a true and correct copy is a true and correct copy of an email from me to Plaintiff's counsel sent on August 16, 2013.

3. Exhibit B is a true and correct copy of the document bearing the Bates number G-IPE-0892255, which I produced to Plaintiff's counsel on August 16, 2013. This document contains revenue figures for October 1, 2012 through November 30, 2012.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 26th day of August, 2013 at San Francisco, CA.



Margaret P. Kammerud

DATED: August 26, 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
senoona@kaufcan.com

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 August 26, 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