

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 JENNIFER POLSE IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFF’S MOTION FOR JUDGMENT UNDER RULE 52(B)
AND A NEW TRIAL UNDER RULE 59 ON LACHES**


I, Jennifer Polse, declare as follows:

1. I am in-house counsel for Defendant Google Inc. (“Google”), as well as Google’s corporate representative 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. Google has been indemnifying and paying for the defense costs since the inception of this case of all other Defendants arising out of their use of Google’s accused systems. As part of this indemnity, Google has pledged to pay and will pay any monetary judgment levied against the other Defendants for their use of Google’s accused systems.

I declare under penalty of perjury of the laws of the United States that the foregoing is

true and correct.

Dated: January 24, 2013



Jennifer Polse

DATED: January 25, 2013

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 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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