

**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



Margaret P. Kammerud

DATED: May 13, 2013

/s/ Stephen E. Noona

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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:

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