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Attorneys for Defendant
Google Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AUTHORS GUILD, INC., Associational
Plaintiff, BETTY MILES, JOSEPH
GOULDEN, and JIM BOUTON, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 05 CV 8136 (DC)

ECF Case

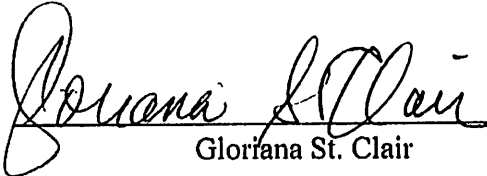
**DECLARATION OF GLORIANA ST. CLAIR
IN SUPPORT OF DEFENDANT GOOGLE INC.'S
MOTION FOR SUMMARY JUDGMENT**

I, Gloriana St. Clair, declare as follows:

1. I am the Dean of University Libraries at Carnegie Mellon University in Pittsburgh, Pennsylvania. I am also a director of the Universal Digital Library, whose main project is the Million Book Project.

2. I have been retained by Defendant Google Inc. to provide my opinions regarding the challenges libraries and others face in identifying and finding copyright owners, and regarding the practices of libraries with respect to digitization of books at the time Google began its Google Books project.

3. My expert report, which was submitted in this matter on May 4, 2012, is attached hereto as Exhibit A. The facts in that report stated on my personal knowledge are true and correct. The report also states truly and correctly my opinions in this matter, based on the facts of which I have personal knowledge and the additional information reflected in the report. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 18, 2012 in Pittsburgh, Pennsylvania.


Gloriana St. Clair