

KILPATRICK TOWNSEND & STOCKTON LLP

Joseph Petersen (JP 9071)
31 West 52nd Street, 14th Floor
New York, NY 10019
Telephone: (212) 775-8700
Facsimile: (212) 775-8800
Email: jpetersen@kilpatricktownsend.com

Joseph M. Beck (admitted *pro hac vice*)
W. Andrew Pequignot (admitted *pro hac vice*)
Allison Scott Roach (admitted *pro hac vice*)
1100 Peachtree Street, Suite 2800
Atlanta, Georgia 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
Email: jbeck@kilpatricktownsend.com

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, INC., ET AL.,

Plaintiffs,

v.

HATHITRUST, ET AL.,

Defendants.

Case No. 11 Civ. 6351 (HB)

**DECLARATION OF JOSEPH PETERSEN IN FURTHER SUPPORT OF
DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

I, Joseph Petersen, make the following declaration:

1. I am a member of the Bar of this Court and a partner at the law firm of Kilpatrick Townsend & Stockton LLP, attorneys for the Defendants in the above-captioned action (“Defendants”). I make this Declaration, based on my own personal knowledge, in further support of Defendants’ Motion for Judgment on the Pleadings.

2. Attached as **Exhibit A** is a true and correct copy of Plaintiff The Authors Guild, Inc.’s Responses and Objections to Defendants’ First Set of Requests For Admission.

3. Attached as **Exhibit B** is a true and correct copy of Plaintiff The Authors Guild, Inc.’s Responses and Objections to Defendants’ First Set of Interrogatories and Requests for the Production of Documents.

4. Attached as **Exhibit C** is a true and correct copy of Plaintiff Union des Ecrivaines et des Ecrivains Quebecois’ Responses and Objections to Defendants’ First Set of Requests For Admission.

5. Attached as **Exhibit D** is a true and correct copy of Plaintiff Sveriges Forfatterforbund’s Responses and Objections to Defendants’ First Set of Requests For Admission.

6. Attached as **Exhibit E** is a true and correct copy of Plaintiff Norsk Faglitteraer Forfatter-og Oversetterforening’s Responses and Objections to Defendants’ First Set of Requests For Admission.

7. Attached as **Exhibit F** is a true and correct copy of Plaintiff Authors’ Licensing and Collecting Society’s Responses and Objections to Defendants’ First Set of Requests For Admission.

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

Dated: February 17, 2012

/s/ Joseph Petersen
Joseph Petersen