

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

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THE AUTHORS GUILD, INC., et al.,	:	
<i>Plaintiffs,</i>	:	Case No. 11-cv-6351(HB)
v.	:	
HATHITRUST, et al.,	:	
<i>Defendants.</i>	:	
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**DECLARATION OF LAURA GINSBERG ABELSON
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Laura Ginsberg Abelson, do hereby declare that:

1. I am over eighteen years of age and am competent to make this Declaration.
2. I am attorney admitted to practice in the State of Maryland, the United States District Court for the District of Maryland, and the Fourth Circuit Court of Appeals. I have been admitted *pro hac vice* in this matter.
3. Attached hereto as Exhibit A is a true copy of excerpts from the transcript of the Rule30(b)(6) deposition of the Copyright Clearance Center by Fredric L. Haber, its General Counsel, taken on June 4, 2012.
4. Attached hereto as Exhibit B is a true copy of excerpts from the transcript of the Rule30(b)(6) deposition of Google, Inc. by Daniel Clancy, Engineering Director, taken on June 1, 2012.
5. Attached hereto as Exhibit C is a true copy of excerpts from Objections and Responses of the Individually Named Plaintiffs to Defendant-Intervenors' First Set of Interrogatories and First Request for the Production of Documents, dated May 8, 2012.

6. Attached hereto as Exhibit D is a true copy of the Declaration of Georgina Kleege, dated December 5, 2011, as previously filed in support of Defendant Intervenors' Motion to Intervene.

7. Attached hereto as Exhibit E is a true copy of the Declaration of Blair Seidlitz, dated December 6, 2011, as previously filed in support of Defendant Intervenors' Motion to Intervene.

8. Attached hereto as Exhibit F is a true copy of the Declaration of Courtney Wheeler, dated December 6, 2011, as previously filed in support of Defendant Intervenors' Motion to Intervene.

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

Dated: June 29, 2012

/s/
Laura Ginsberg Abelson