

EXHIBIT J

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Attorneys for Plaintiff

OVERTURE SERVICES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

OVERTURE SERVICES, INC., a
Delaware Corporation,

Plaintiff,

vs.

GOOGLE INC., a California Corporation,
Defendant.

No. C02-01991 JSW (EDL)

**OVERTURE SERVICES, INC.'S
FOURTH SET OF REQUESTS FOR
THE PRODUCTION OF DOCUMENTS
AND THINGS (NOS. 78-91) TO
GOOGLE INC.**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Overture Services Inc. ("Overture"), requests that Defendant, Google Inc. ("Google"), respond in writing to the following requests for the production of documents and things. Overture requests that the documents be produced by Google for inspection and copying within thirty (30) days after the date of service hereof, at the offices of Brinks Hofer Gilson &

1 Lione, 455 North Cityfront Plaza Drive, NBC Tower, Suite 3600, Chicago, Illinois 60611,
2 or at such time or place as counsel may agree upon.

3 If Google withholds from production any of the requested documents on the basis
4 of a claim of attorney-client privilege or work-product immunity, Overture requests that
5 Google provide, within thirty (30) days of service of this request, or at a time mutually
6 agreed upon by the parties, a list identifying each withheld document in accordance with
7 Fed. R. Civ. P. 26(b)(5).

8 9 **DEFINITIONS AND INSTRUCTIONS**

10 The definitions and instructions set forth in Overture's First Set of Requests for
11 Production of Documents are hereby incorporated by reference.

12 13 **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

14 78. All documents relating to any discussions, meetings, or communications of
15 any sort concerning any acquisition or merger involving Google.

16
17 79. All documents relating to any discussions, meetings, or communications
18 involving Google and another company, corporation, or entity and concerning the '361
19 patent.

20
21 80. All documents relating to any discussions, meetings, or communications
22 involving Google and another company, corporation, or entity and concerning any
23 litigation involving Overture.

24
25 81. All documents relating to any discussions, meetings, or communications
26 involving Google and another company, corporation, or entity and concerning any
27 intellectual property belonging to Overture.
28

1 82. All documents relating to any discussions, meetings, or communications
2 involving Google and another company, corporation, or entity and concerning
3 infringement or noninfringement of any claim of the '361 patent.

4
5 83. All documents relating to any discussions, meetings, or communications
6 involving Google and another company, corporation, or entity and concerning validity or
7 invalidity of any claim of the '361 patent.

8
9 84. All documents relating to any discussions, meetings, or communications
10 involving Google and another company, corporation, or entity and concerning
11 enforceability or unenforceability of any claim of the '361 patent.

12
13 85. All documents relating to any discussions, meetings, or communications
14 involving Google and another company, corporation, or entity and concerning the
15 interpretation or scope of any of claim of the '361 patent.

16
17 86. All documents relating to any discussions, meetings, or communications
18 involving Google and another company, corporation, or entity and concerning any oral
19 or written opinion of legal counsel with respect to:

- 20 (a) infringement or noninfringement of any claim of the '361 patent;
21 (b) validity or invalidity of any claim of the '361 patent;
22 (c) enforceability or unenforceability of any claim of the '361 patent; or
23 (d) interpretation or scope of any of claim of the '361 patent.

24
25 87. All documents relating to any agreements entered into or proposed
26 between Google and another company, corporation, or entity concerning any intellectual
27 property belonging to Overture.

1 88. All documents relating to any agreements entered into or proposed
2 between Google and another company, corporation, or entity concerning any litigation
3 involving Overture.

4
5 89. All documents relating to any meetings or discussions between Google
6 and FindWhat.com ("FindWhat") concerning the '361 patent.

7
8 90. All documents relating to any agreements entered into or proposed
9 between Google and FindWhat concerning any intellectual property belonging to
10 Overture.

11
12 91. All documents relating to any agreements entered into or proposed
13 between Google and FindWhat concerning any litigation involving Overture.

14
15 Dated: August 12, 2003

By: 

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25 Attorneys for Plaintiff
26 OVERTURE SERVICES, INC.
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies the foregoing OVERTURE SERVICES, INC.'S
FOURTH SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND
THINGS (NOS. 78-91) TO GOOGLE INC., was served this 12th day of August, 2003,
via facsimile, with confirmation copy via first-class mail, upon:

facsimile number (415) 397-7188

Michael S. Kwun
Keker & Van Nest, LLP
710 Sansome Street
San Francisco, CA 94111-1704

A handwritten signature in cursive script, appearing to read "Jason C. Tate", is written over a horizontal line.