

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

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FLOWBEE INTERNATIONAL, INC.  
and FLOWBEE HAIRCUTTER  
LIMITED PARTNERSHIP,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

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Civil Action No. C-09-199

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**DEFENDANT GOOGLE INC'S AMENDED  
LIST OF PERSONS WITH RELEVANT KNOWLEDGE**

Google has identified persons likely to have discoverable information that Google may use to support its claims or defenses who Google presently believes are most knowledgeable about the listed subjects, but Google reserves its right to further supplement these disclosures as discovery progresses. Google employees or former employees, including those identified below, may be contacted only through Google counsel.

Name	Subjects

Heather Wilburn	Information concerning the operation of Google’s search engine and AdWords program.
Rose Hagan	Information concerning Google’s U.S. trademark policies relating to its AdWords program.
Alana Karen	Information concerning AdWords advertisers and advertisements and the implementation of the Google AdWords service.
Bill Lloyd	Information relating to the processing of complaints concerning use of trademarks in AdWords program advertising.
Tracy Lee-Blumberg	Information relating to Flowbee’s advertising account.
Prashanth Koppula	Information concerning the operation of Google’s AdSense for Domains program.
Baris Gultekin	Information regarding the legacy functionality of the AdWords keyword tool.
Daniel Dulitz	Information relating to the functionality and appearance of “Sponsored Links,” including nonprivileged consumer research relating thereto.
Edward Chiang	Information regarding the functionality of the AdWords keyword tool.
Richard Holden	Information regarding the functionality of the AdWords program.

The above individuals may be contacted only through counsel at Quinn Emanuel Urquhart Oliver & Hedges, 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California, 94065, (650) 801-5000.

In addition, current or former employees and counsel of Plaintiffs’ competitor, RoboCut Inc. are likely to have information relating to RoboCut’s AdWords advertising, including the reasons for such advertising and applicable defenses to Flowbee’s allegations of contributory and vicarious infringement against Google for actions of RoboCut. To the best of Google’s knowledge, RoboCut’s mailing address is P.O. Box 270130, Fort Collins, Colorado U.S.A.,

80527-0130, and its telephone number is (970) 225-9060. RoboCut's counsel of record in the 2004 litigation between Flowbee and RoboCut in the Northern District of California was Karl S. Kronenberger, 220 Montgomery Street, Suite 1920, San Francisco, CA 94101, telephone number (415) 955-1155.

In addition, current or former employees and counsel of Flowbee International and Flowbee Haircutter Limited Partnership are likely to have discoverable information that Google may use to support its defenses, including information relating to preclusion, laches, and the statute of limitations. Flowbee's counsel of record in the 2004 litigation between Flowbee and RoboCut in the Northern District of California was Lawrence G. Townsend, 455 Market Street, 19th Floor, San Francisco, California 94105, telephone number (415) 882-3288.

These disclosures do not include any expert witnesses who will be identified pursuant to Rule 26.

Respectfully submitted,

s/ Margret M. Caruso

MARGRET M. CARUSO (*admitted pro hac vice*)

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ATTORNEYS FOR DEFENDANT GOOGLE INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6th, 2009, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to individuals who have consented in writing to accept this Notice as service of this document by electronic means. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by first class mail today, October 6th, 2009.

s/ Margret M. Caruso  
Margret M. Caruso