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3   UNITED STATES DISTRICT COURT

4   NORTHERN DISTRICT OF CALIFORNIA

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6   CASE NO. 3:11-MC-80016-RS

7   GOOGLE INC. AND YOUTUBE LLC,

8   Plaintiffs,   **REVISED [PROPOSED] ORDER
                                               GRANTING PLAINTIFFS' MOTION TO
9   vs.   COMPEL THE PRODUCTION OF
                                               DOCUMENTS FROM THIRD PARTY
10 IPVALUE MANAGEMENT INC.   IPVALUE MANAGEMENT INC.**

11   Defendants.

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01980.51645/4013142.1

REVISED [PROPOSED] ORDER GRANTING MOTION TO COMPEL

1	Plaintiff Google Inc., Defendant in a District of Delaware action for patent infringement
2	haS filed a Motion to Compel the Production of Documents from IPValue Management Inc., a
3	Third Party to the Delaware action residing in this District.
4	Having considered Google's request, and good cause appearing, the Court hereby
5	**GRANTS** Google's Motion to Compel and **ORDERS as follows:**
6	1. IPValue shall produce all documents responsive to Request Nos. 1-6 and 8-13 of
7	Google's subpoena, including documents communicated to Xerox and third parties.
8	2. With respect to internal documents responsive to Request Nos. 3-6 and 8-12 of
9	Google's subpoena, IPValue shall search for such documents by searching the files of the
10	following custodians:
11	Paul Riley
12	Kapu Kumar
13	Katerina Varsou
14	Andres Diaz
15	Steve Shin
16	Sanjay Prasad
17	Keith Wilson
18	Mitch Rosenfield
19	IPValue shall use the following search terms in searching the files of the custodians listed above:
20	6778979
21	979
22	Grefenstette
23	Shanahan
24	Xerox /20 patent
25	(Google or Yahoo!)/5 "prior art"
26	Organized classification of document content
27	Automatically identifying a set of entities
28	Automatically categorizing the selected document content

1   Automatically formulating the query to restrict a search

2   Formulat! /3 query

3   AdSense for Content

4   Content Ads

5   AFC

6   (Google or Yahoo!) w/10/prior art/

7   (Google or Yahoo!) w/10 979

8   (Google or Yahoo!) w/10 automat*

9   (Google or Yahoo!) w/10 complaint*

10   (Google or Yahoo!) w/10 court*

11   (Google or Yahoo!) w/10 generat*

12   (Google or Yahoo!) w/10 infring*

13   (Google or Yahoo!) w/10 investigat*

14   (Google or Yahoo!) w/10 Xerox

15   (Google or Yahoo!) w/10 judg*

16   (Google or Yahoo!) w/10 law

17   (Google or Yahoo!) w/10 laws

18   (Google or Yahoo!) w/10 lawsuit*

19   (Google or Yahoo!) w/10 lawyer

20   (Google or Yahoo!) w/10 legal*

21   (Google or Yahoo!) w/10 patent*

22   (Google or Yahoo!) w/10 quer*

23   (Google or Yahoo!) w/10 sue

24   (Google or Yahoo!) w/10 sued

25   (Google or Yahoo!) w/10 sues

26   (Google or Yahoo!) w/10 suit

27   (Google or Yahoo!) w/10 violat*

28   (Google or Yahoo!) w/25 licens*

1   (Google or Yahoo!) w/25 offer*

2   (Google or Yahoo!) w/25 proposal*

3   (Google or Yahoo!) w/5 case

4   (Google or Yahoo!) w/5 cases

5   (Google or Yahoo!) w/5 content*

6   (Google or Yahoo!) w/5 context*

7   (Google or Yahoo!) w/5 exchang*

8   (Google or Yahoo!) w/5 market*

9   (Google or Yahoo!) w/ match*

10   (Google or Yahoo!) w/ matter*

11   (Google or Yahoo!) w/5 network

12   Content Match

13   Y!Q

14   Contextual Search

15   Right Media

16   RMX

17   Yahoo! Publisher Network

18   Yahoo! Search Marketing

19   DocSouls

20   Document Souls

21   XLP56

22   XLP57

23   XLP58

24   IPValue shall commence its production of non-privileged, responsive documents within 7

25 days of the Court's order and complete its production within 21 days of the Court's order. IPValue

26 shall also produce a privilege log identifying any documents withheld as privileged by within 28

27 days of the Court's Order.

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1   IT IS SO ORDERED.

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3 DATED:

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5   _____
                                                     The Honorable
6   United States District Judge

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