

EXHIBIT I

Klaus Hamm

REDACTED

-----Original Message-----

From: Rammelt David A. [mailto:DRammelt@KelleyDrye.com]
Sent: Friday, March 03, 2006 11:20 AM
To: Klaus Hamm
Cc: Michael Page; Ajay Krishnan; Greenspon, Susan
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

ABWF is located in Plymouth, which is a little nicer area. We can arrange a conference room at local counsel nearby if you like.

-----Original Message-----

From: Klaus Hamm [mailto:KHamm@kvn.com]
Sent: Friday, March 03, 2006 1:02 PM
To: Rammelt David A.
Cc: Michael Page; Ajay Krishnan; Greenspon, Susan
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

Let's do April 20. Ajay will be in touch confirming the Detroit-area location.

From: Rammelt David A. [mailto:DRammelt@KelleyDrye.com]
Sent: Friday, March 03, 2006 9:15 AM
To: Klaus Hamm
Cc: Michael Page; Ajay Krishnan; Greenspon, Susan
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

Klaus -- either April 19th or April 20th works for us. The deposition will be in the Detroit area.

I trust we are still confirmed for Google's representative on April 12 in San Jose.

-----Original Message-----

From: Klaus Hamm [mailto:KHamm@kvn.com]
Sent: Wednesday, March 01, 2006 5:40 PM
To: Rammelt David A.
Cc: Michael Page; Ajay Krishnan
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

David,

Any word about when ABWF's 30(b)(6) designee will be available? Ajay Krishnan sent Caroline Plater a letter earlier this week proposing a number of possibilities. I'm working on dates for our 30(b)(6) designees, but it's difficult with so many moving targets. In particular, April 3 and 4 may be convenient dates for one or more of our designees, but our proposal for when we take ABWF's deposition included those dates (as well as April 19 or 20). If the 19th or 20th works for ABWF's deposition, perhaps we can schedule Google's for April 3 and/or 4. Because scheduling is difficult, I'd appreciate a response as soon as possible.

Regards,
Klaus

From: Rammelt David A. [mailto:DRammelt@KelleyDrye.com]
Sent: Wednesday, March 01, 2006 12:35 PM
To: Klaus Hamm
Cc: Michael Page
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

Objections? To our narrowly-crafted, entirely relevant requests?

-----Original Message-----

From: Klaus Hamm [mailto:KHamm@kvn.com]
Sent: Wednesday, March 01, 2006 2:23 PM
To: Rammelt David A.
Cc: Michael Page
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

We anticipate that our designee will testify about topics 4, 6, and 12, subject to our objections (which we intend to serve on ABWF along with our objections to the RFPs incorporated into ABWF's amended 30(b)(6) notice). Because we anticipate designating her for only these three topics, the deposition should not take 7 hours.

From: Rammelt David A. [mailto:DRammelt@KelleyDrye.com]
Sent: Wednesday, March 01, 2006 11:31 AM
To: Klaus Hamm
Cc: Michael Page
Subject: RE: Google v. ABWF: ABWF's 30(b)(6) notices

April 12th would work. Which subject area(s)? I am trying to determine if it will take more than a day. Also, we should discuss the 7-hour deposition rule and whether we will agree to going beyond the presumptive time limit for witnesses.

-----Original Message-----

From: Klaus Hamm [mailto:KHamm@kvn.com]
Sent: Wednesday, March 01, 2006 12:05 PM
To: Rammelt David A.
Cc: Michael Page
Subject: Google v. ABWF: ABWF's 30(b)(6) notices

David,

We anticipate that we will designate four people to testify in response to ABWF's two 30(b)(6) notices. One of our 30(b)(6) designees is available on April 5, 11, 12 or 14. Please let me know as soon as possible which one of these dates will work for you.

Regards,
Klaus

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The information contained in this E-mail message is privileged, confidential, and may be protected

EXHIBIT J

Klaus Hamm

REDACTED

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]**Sent:** Thursday, March 30, 2006 10:20 AM**To:** Ajay Krishnan**Cc:** Greenspon, Susan**Subject:** RE: Extension of time to respond to Google's letter re document requests

Ajay - We have May 11th open. Unfortunately, both our client and attys are pretty solidly booked in these two weeks. If this date does not work for Google, I will go into the following weeks for more dates. Please let me know how you would like to proceed.
Thanks, Carrie

-----Original Message-----

From: Ajay Krishnan [mailto:AKrishnan@kvn.com]**Sent:** Wednesday, March 29, 2006 6:15 PM**To:** Plater, Caroline C.**Subject:** RE: Extension of time to respond to Google's letter re document requests

Great. Thanks.

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]**Sent:** Wednesday, March 29, 2006 4:14 PM**To:** Ajay Krishnan**Subject:** RE: Extension of time to respond to Google's letter re document requests

Ajay, I appreciate the prior difficulties in scheduling. We will set a new date. I just have to get a hold of our client. I hope to do that within the next day. I will provide you with the potential dates as soon as I speak to him. Thanks, Carrie

-----Original Message-----

From: Ajay Krishnan [mailto:AKrishnan@kvn.com]**Sent:** Wednesday, March 29, 2006 6:06 PM**To:** Plater, Caroline C.**Subject:** RE: Extension of time to respond to Google's letter re document requests

Thanks, Carrie. I just wanted to clarify that my agreement to the one-week extension was contingent on actually settling on a new 30(b)(6) deposition date (as you might recall, arriving at the April 20th date was not a trivial process). I am confident, though, that if you provide a reasonable number of options in those first two weeks of May, we will be able to work this out. For the present, however, since we have not yet reached agreement, we are still on a fairly tight timeline. Do you know when you will be able to get back to me with potential dates?

Thanks,
Ajay

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]

6/15/2006

Sent: Wednesday, March 29, 2006 3:38 PM
To: Ajay Krishnan
Subject: RE: Extension of time to respond to Google's letter re document requests

Ajay -- Thank you for the accommodation. We agree to reschedule Google's 30(b)(6) deposition of ABWF and agree to try to provide mutually convenient dates in the first two weeks of May. Once we have ascertained our client's availability during that time, I will transmit the potential dates to you. Your cooperation is appreciated.

Regards,
Carrie Plater

-----Original Message-----

From: Ajay Krishnan [mailto:AKrishnan@kvn.com]
Sent: Wednesday, March 29, 2006 5:27 PM
To: Plater, Caroline C.
Subject: Extension of time to respond to Google's letter re document requests

Dear Caroline,

Thank you for your letter from this morning concerning Google's discovery disputes. Although I would normally agree to the extension you proposed, I need to ensure that Google obtains the many categories of documents mentioned in my letter from yesterday *before* Google's 30(b)(6) deposition of ABWF. I would therefore agree to push back ABWF's time to respond so long as you can provide a later date that is convenient for Google's attorneys at which ABWF's representative will be available for a 30(b)(6) deposition. Based on our last round of deposition scheduling, there were no mutually agreeable dates in April. If you can provide a date in the first two weeks of May that is convenient for Google's attorneys for a 30(b)(6) deposition, I will agree to the one week extension you proposed.

Sincerely,

Ajay Krishnan

Ajay S. Krishnan
Keker & Van Nest LLP
710 Sansome Street
San Francisco, CA 94111
(415) 391-5400
akrishnan@kvn.com

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Pursuant to Treasury Regulations, any U.S. federal tax advice contained in this communication, unless otherwise stated, is not intended and cannot be used for the purpose of avoiding tax-related penalties.

EXHIBIT K

Doris Joos

REDACTED

From: Ajay Krishnan
Sent: Wednesday, May 03, 2006 10:23 AM
To: 'Plater, Caroline C.'
Cc: Klaus Hamm
Subject: RE: Steve Katzman & Rose Hagan depos

Thanks.

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]
Sent: Wednesday, May 03, 2006 10:22 AM
To: Ajay Krishnan
Cc: Klaus Hamm
Subject: RE: Steve Katzman & Rose Hagan depos

Ajay - I am still waiting on confirmation for the 6th. I apologize for the continued delay. I just asked again and passed on your dates for Rose Hagen. I should be able to confirm at least Katzman today.
Carrie

-----Original Message-----

From: Ajay Krishnan [mailto:AKrishnan@kvn.com]
Sent: Wednesday, May 03, 2006 12:15 PM
To: Ajay Krishnan; Plater, Caroline C.
Cc: Klaus Hamm
Subject: Steve Katzman & Rose Hagan depos

Carrie -- have you heard back yet about June 6th for the 30(b)(6) deposition of Steve Katzman?

Also, how do June 12, 13, or 14 look for the Rose Hagan deposition?

Thanks,

Ajay

-----Original Message-----

From: Ajay Krishnan
Sent: Monday, May 01, 2006 7:08 PM
To: 'Plater, Caroline C.'
Subject: RE: Steve Katzman Dep.

June 6th is available. Once I get your confirmation, I'll send out a new depo notice. Thanks, Ajay

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]
Sent: Monday, May 01, 2006 3:19 PM
To: Ajay Krishnan
Cc: Klaus Hamm

6/15/2006

Subject: RE: Steve Katzman Dep.

Ajay - could you also check to see if June 6 is available? thanks, Carrie

-----Original Message-----

From: Ajay Krishnan [mailto:AKrishnan@kvn.com]
Sent: Monday, May 01, 2006 5:08 PM
To: Plater, Caroline C.
Cc: Klaus Hamm
Subject: RE: Steve Katzman Dep.

Carrie -- Alternative dates that will work are May 31, June 1, and June 2. Thanks, Ajay

-----Original Message-----

From: Plater, Caroline C. [mailto:CPlater@KelleyDrye.com]
Sent: Monday, May 01, 2006 1:06 PM
To: Ajay Krishnan
Cc: Klaus Hamm
Subject: Steve Katzman Dep.

Ajay - I apologize for the late notice. But, I just found out that we must cancel Mr. Katzman's dep. scheduled for May 11. A hearing was just set in one of David's cases on the same date, which will require him to be out of the country (as U.S. counsel in the foreign court we have little say in scheduling matters). I will also be out of town that week.

Please ask Michael Page for dates that are convenient for him in late May or early June to reschedule this deposition and we will work with you to schedule it at a mutually convenient time.

I appreciate your cooperation in this matter. - Carrie

Caroline C. Plater
Kelley Drye & Warren LLP
333 W. Wacker, Suite 2600
Chicago, IL 60606
312.857.2501 (direct)
312.857.7095 (fax)

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EXHIBIT L

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June 13, 2006

VIA FACSIMILE

Klaus Hamm
Keker & Van Nest LLP
710 Sansome Street
San Francisco, CA 94111

Re: Google Inc. v. American Blind & Wallpaper Factory Inc.

Dear Klaus:

Joe Charno is available for his deposition June 29-30; Scot Powers and Jeff Alderman are available for their depositions July 10-12. We are available for Steve Katzman's deposition July 17-21, 24 or 25. We are not representing Mr. Katzman and have not been notified of the name of his counsel for this deposition. Therefore, we cannot make any statements regarding Mr. Katzman's availability on the dates that we have indicated we have available.

We will provide you with firm dates for and the identity of American Blind's Fed.R.Civ.P. 30(b)(6) witness by June 22, 2006.

Please feel free to contact me regarding the foregoing.

Sincerely,



Caroline C. Plater

CCP:ccp

EXHIBIT M

LAW OFFICES

**KEKER & VAN NEST
LLP**

710 SANSOME STREET
SAN FRANCISCO, CA 94111-1704
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FAX (415) 397-7188
WWW.KVN.COM

KLAUS H. HAMM
KHAMM@KVN.COM

May 19, 2006

VIA FACSIMILE AND U.S. MAIL

David A. Rammelt
Kelley Drye & Warren LLP
333 West Wacker Drive
26th Floor
Chicago, IL 60606

Re: *Google Inc. v. American Blind & Wallpaper Factory, Inc.*

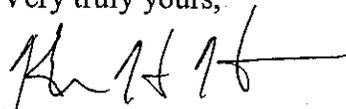
Dear David:

Google would like to take the depositions of the following individuals listed in American Blind's initial disclosures: Joe Charno, Bill Smith, Jeff Alderman and Scot Powers. American Blind has represented that each of these individuals can be contacted through counsel for American Blind. We would like to take Mr. Charno's deposition on June 19, Mr. Powers' deposition on June 20, Mr. Alderman's deposition on June 21, and Mr. Smith's deposition on June 22.

I have enclosed deposition notices for Messrs. Powers, Alderman and Smith. In the event that one or more of these individuals are not directors, officers or managing agents of American Blind, please let me know if you do not agree to voluntarily produce them for deposition. Because I understand that American Blind no longer employs Mr. Charno, I have enclosed a subpoena for his testimony (along with a deposition notice). Please advise if you will accept service on his behalf.

If the deposition dates are not convenient, please propose alternative dates, keeping in my mind that we would like to take these depositions on consecutive days, that we would like to take these depositions no earlier than a week after American Blind has completed its document production, and that fact discovery closes on June 27.

Very truly yours,



Klaus H. Hamm

KHH
Enclosures
cc: Carolyn Plater

EXHIBIT N

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KLAUS H. HAMM
KHAMM@KVN.COM

June 1, 2006

VIA FACSIMILE AND U.S. MAIL

David A. Rammelt
Kelley Drye & Warren LLP
333 West Wacker Drive
26th Floor
Chicago, IL 60606
Facsimile: 312/857-7095

Re: *Google Inc. v. American Blind & Wallpaper Factory, Inc.*

Dear David:

I write regarding the depositions of current and former American Blind employees. Although this case has been pending for two and half years and fact discovery closes in less than four weeks, Google has not yet been able to take any depositions.

My May 19 letter to you enclosed deposition notices for Bill Smith, Jeff Alderman and Scot Powers. That letter requested that you notify me if the noticed dates are not convenient. Because I have not received a response from you, I assume that the dates are acceptable. My May 19 letter also enclosed a deposition subpoena for Joe Charno and inquired whether you would accept service of this subpoena. Because I have not heard from you, I assume that you will not accept service. Starting tomorrow, we will attempt to serve Mr. Charno.

With this letter, I enclose a deposition subpoena for Steve Katzman. Please advise me by 2 p.m PST tomorrow whether you will accept service of this subpoena. If I do not hear from you, we will attempt to serve Mr. Katzman.

Finally, please notify us who will serve as American Blind's designee for the 30(b)(6) notice that Google served on February 15 and provide us with dates for when he or she will be available for deposition.

Please feel free to contact me about any of the issues raised in this letter.

Very truly yours,



Klaus H. Hamm

Enclosure
cc: Carolyn Plater

EXHIBIT O

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June 12, 2006

VIA FACSIMILE

Klaus Hamm
Keker & Van Nest LLP
710 Sansome Street
San Francisco, CA 94111

Re: Google Inc. v. American Blind & Wallpaper Factory Inc.

Dear Klaus:

This is to confirm our participation in William Smith's deposition noticed for June 22, 2006 in Detroit, Michigan. We will not be representing Mr. Smith.

We will confirm the dates for the other deponents whom we will be representing by separate letter.

Sincerely,



Caroline C. Plater

CCP:hke

EXHIBIT P

LAW OFFICES

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KLAUS H. HAMM
KHAMM@KVN.COM

April 6, 2006

VIA FEDERAL EXPRESS

David A. Rammelt, Esq.
Kelley Drye & Warren LLP
333 West Wacker Drive
26th Floor
Chicago, IL 60606

**Re: Google Inc. v. American Blind & Wallpaper Factory, Inc.,
SDC ND Cal. Case No. C-03-5340**

Dear David:

Enclosed please find documents Bates labeled GGL005572 – GGL005970. The documents labeled GGL005572 - GGL005710 were collected from Michael Kwun, and consist of papers and presentations regarding, among other things, Google's trademark policy regarding keywords. The range GGL005711 – GGL005970 is information from the Google AdWords Help Center.

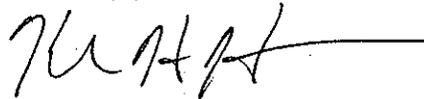
Also please find enclosed a CD labeled GGLE003. The range GGLE00018969 - GGLE19809 consists of emails collected from Rose Hagan; GGLE00019810 – GGLE00019864 are emails collected from Rosalyn Huynh; and the range GGLE00019865 – GGLE00019867 is an email collected from Tu Tsao. GGLE00019868 – GGLE00020949 are documents from Google's customer service interface program and are organized by ticket number (generally visible in the subject line).

Finally, GGLE00020950 - GGLE0021227, is data from AdsDB, which is a Google database for ad serving and reporting. This data is responsive to many of American Blind's document requests, including but not limited to request numbers 1-3, 6, 17, 18, 24, 28 and 29. Google, however, does not necessarily intend to give significance, legal or otherwise, to the terminology used in these requests. For example, request number 3 refers to the "selling or marketing of trademarks in connection with the AdWords program," and Google does not sell or market trademarks in connection with AdWords. As a result, the data provided is responsive to this request only insofar as this request accurately reflects the governing law and the facts of this case.

David A. Rammelt, Esq.
April 6, 2006
Page 2

Should you have questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Klaus H. Hamm', with a long horizontal stroke extending to the right.

Klaus H. Hamm

KHH:daj
Enclosures

EXHIBIT Q

Klaus Hamm

From: Klaus Hamm
Sent: Tuesday, April 18, 2006 7:25 AM
To: 'Rammelt David A.'
Cc: Plater, Caroline C.; Michael Page
Subject: RE: ABWF v. Google

The three other witnesses that will address topics set forth in American Blind's two 30(b)(6) notices are Prashant Fuloria, Rose Hagan and Michael Kwun. I will provide you with dates in June when Ms. Hagan and Mr. Kwun are available, as requested by Carrie's April 7 letter. Based on the deposition notice for Mr. Fuloria that we received on Friday, I assume that you would prefer to take his deposition in May. Mr. Fuloria is not available on the noticed date of May 8; I will attempt to provide a mutually convenient May date for Mr. Fuloria's deposition.

From: Rammelt David A. [mailto:DRammelt@KelleyDrye.com]
Sent: Tuesday, April 18, 2006 7:12 AM
To: Klaus Hamm
Cc: Plater, Caroline C.
Subject: Re: ABWF v. Google

I believe we have destroyed it.

Please confirm with Carrie.

Who are the three remaining 30(b)(6) witnesses Google intends to produce?

David A. Rammelt
Kelley Drye & Warren LLP
333 W. Wacker Drive
Chicago, Illinois 60606
(312) 857-7077 (direct)
(312) 857-7095 (fax)
drammelt@kelleydrye.com

-----Original Message-----

From: Klaus Hamm
To: Rammelt David A.
CC: Michael Page
Sent: Tue Apr 18 08:58:17 2006
Subject: ABWF v. Google

Dear David,

I have not yet received a reply from you to my April 11, 2006 letter regarding a privileged document that Google inadvertently produced to American Blind. Pursuant to paragraph 13 of the protective order, please return that document and confirm that you have destroyed all copies of it. I look forward to a response soon.

Regards,
Klaus H. Hamm
Keker & Van Nest LLP
710 Sansome Street
San Francisco, CA 94111
(415) 391-5400
(415) 397-7188 (fax)

6/15/2006