

## **Exhibit G**

**KELLEY DRYE & WARREN LLP**

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June 30, 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 in response to your letters of June 26 and June 28, 2006, that respectively object to the deposition notices and Requests for Admission recently served on Google. Your objections are improper and I ask that you withdraw them and timely respond to American Blind's discovery.

In your letters you state that your objections are based on Judge Fogel's June 23, 2006 order that allegedly issued a limited extension of fact discovery and provided that additional discovery could only be issued with leave of court. Your interpretation of this order is not an accurate representation of what Judge Fogel stated at the hearing. Judge Fogel's June 23<sup>rd</sup> order merely extended all deadlines for an additional 60 days and does not provide any explicit limitations on depositions or other discovery. I specifically addressed the fact that American Blind would need to issue additional discovery as a result of Google's recent productions and Judge Fogel indicated that he would not address this issue, but would leave it to the parties to work out. Judge Fogel also indicated that in the event that the parties could not reach an agreement with regard to the scope of discovery, the dispute should be presented to Judge Seeborg.

Furthermore, the deposition notices and Requests for Admission are related to the initial scope of discovery in that they were generated in response to issues presented by Google in its responses to American Blind's discovery, which were received prior to the original close of fact discovery. Thus, your objections as to scope are improper.

KELLEY DRYE & WARREN LLP

Klaus Hamm  
June 30, 2006  
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Please note, in addition to the notices that you received for Mr. Brin and Mr. Page, there are a number of individuals that we will need to depose between now and the close of discovery based upon the documents that Google produced and your Rule 26 disclosures. We will be sending out deposition notices for the individuals disclosed on your Rule 26 initial disclosures early next week.

Given that Mr. Page's name is identified on numerous documents that Google has produced and was identified by Ms. Karen at her deposition as being directly involved in the decisions by Google on its trademark policies, we have every right to take Mr. Page's deposition. As an accommodation and attempt to compromise, we would be willing to not pursue taking Mr. Brin's deposition at this time if you are willing to agree to our right to take Mr. Page's deposition.

We are still waiting to hear from you as to deposition dates for Michael Kwun. In your correspondence to Carrie Plater of our office, dated June 26, 2006, you stated that you would be getting us dates for his deposition. To date we have not heard anything further from you. Since we have a relatively short time frame with many depositions to cover between now and the close of fact discovery, please let me know what dates he is available for his deposition.

If you intend to maintain your objections and do not respond to the recent discovery served on Google, we will be forced to file a motion with Judge Seeborg to address these matters. In that case, we will no doubt address Google's blatant tactic of sending out a flurry of deposition notices just before the previously set fact discovery cut off date in a transparent attempt to make sure that you would not be bound by your current attempt to limit the scope of discovery. Please respond to this letter by 5:00 p.m. CST, July 3, 2006.

Sincerely,



David A. Rammelt

DAR:ccp