

EXHIBIT A

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July 21, 2006

VIA FACSIMILE

Caroline C. Plater, Esq.
Kelley Drye & Warren LLP
333 West Wacker Drive, Suite 2600
Chicago, IL 60606

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

Dear Carrie:

I write regarding five outstanding issues related to ABWF's document production.

First, Bill Smith testified at his deposition that he conducted a study involving "user testing" on ABWF's website. See Transcript of Deposition of William W. Smith, pp. 86-93. ABWF has not produced all documents associated with this study. Based on Mr. Smith's deposition testimony, there should at least be video tapes, reports, questionnaires, scripts, invoices, e-mails, and contracts associated with this study. Documents pertaining to this study would be responsive, at least, to Requests 7, 13, 14, 20, 26, 27, 35, 38, and 39 in Google's First Set of Requests for Production, and Requests 1, 2, 3, 4, and 8 in Google's Second Set of Requests for Production. ABWF has claimed that it has completed its document production, but these documents are responsive, and Google requires them immediately in order to properly prepare for its depositions. Google has already been prejudiced by ABWF's failure to produce these documents. Please produce these documents immediately.

Second, ABWF has not produced to Google copies of every version of ABWF's home page. These documents are responsive, at least, to Requests 5, 13, 19, 26, 27, 38, and 39 in Google's First Set of Requests for Production, and Requests 1, 2, 4, and 8 in Google's Second Set of Requests for Production. Again, please produce these documents immediately.

Third, ABWF has not produced all documents related to the three Kaden focus group studies it conducted. These studies state that participant questionnaires are available, but ABWF has not produced these documents. Such documents are in ABWF's "possession, custody, or control," even if they are currently in the possession of a third party, such as Kaden Company. ABWF was obligated to search for and produce all documents in its control, and has been obligated to obtain these documents from Kaden, if that is where they are. Additionally, ABWF

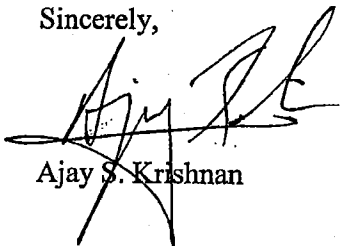
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has not produced scripts, invoices, e-mails, and contracts associated with these three studies. Please produce these documents immediately.

Fourth, several charts that ABWF has produced are illegible, and must be produced again in a legible format. The chart spanning bates range ABWF 5530 to ABWF 5534 contains cells where some of the information in the cell is not visible, given the way the chart was printed. Additionally, the column headings and the columns are not aligned in this chart, creating ambiguity as to which column heading pertains to which column. The charts spanning from bates range ABWF 5605 to ABWF 7802 contain both of these problems as well. Please produce immediately readable copies of the chart spanning the bates range ABWF 5530 to 5534, and the charts spanning from bates range ABWF 5605 to ABWF 7802.

Fifth, on July 6, 2006, I sent you a letter contesting ABWF's position on (1) whether ABWF had waived its objection and claims of privilege with regard to Google's Second Set of Requests for Production, and (2) whether ABWF has produced its documents in "the usual course of business." I never received ABWF's response to that letter. With regard to the first issue in that letter, ABWF has still provided no legal basis for its position. With regard to the second issue, ABWF has not explained why its production complies with the standards regarding the "usual course of business" requirement that were set out in Judge Seeborg's February 6, 2006 order. Please respond to those points by Wednesday, July 26, so that Google can bring these issues to the Court's attention, if necessary.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajay S. Krishnan", is written over a horizontal line.

Ajay S. Krishnan

ASK/rwt

cc: David A. Rammelt, Esq.