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January 4, 2006

VIA FACSIMILE: (415)397-7188

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

Re: *Google Inc. v. American Blind & Wallpaper Factory, Inc.*
Case No. C 03-5340-JF (EAI)

Dear Klaus:

This responds to your letter dated January 3, 2006. Based on the information you have provided, we are not inclined to withdraw our motion to compel.

Assuming for the sake of argument that every single one of the over one hundred-ten thousand pages of materials that have been produced by Google are responsive to our Request No. 44, that still does not answer whether any of these documents are responsive to any of the other requests. For example, of the documents Google has produced thus far in hard copy or electronically, which documents are responsive to Request No. 3? Which of these documents are responsive to Request No. 4?

Likewise, which of the documents was Google referring to in its response to our Interrogatory question No. 1? Which specific documents was Google referring to in its response to our Interrogatory No. 2?

As you can see, simply stating that every single document produced in this case responds to our Request No. 44 does little to advance the ball, nor does it satisfy Google's obligations under the Federal Rules of Civil Procedure.

Please do not hesitate to contact me if you have any further comments or questions.

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Very truly yours,

David A. Rammelt/sfd

David A. Rammelt

DAR/sfd