

EXHIBIT A

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EXHIBIT B

**THIS EXHIBIT HAS BEEN
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EXHIBIT C

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EXHIBIT D

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EXHIBIT E

Andrea P Roberts

From: Andrea P Roberts
Sent: Tuesday, March 29, 2011 7:44 PM
To: Bennett, Jennifer D.
Cc: Google-PUM; 'rhorwitz@potteranderson.com'; 'dmoore@potteranderson.com'
Subject: PUM v. Google

Jennifer,

I write in response to your letter today regarding the Horling, Ponnekanti, and Gopalratnam depositions. We won't be able to respond to this letter until later this week.

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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EXHIBIT F

Andrea P Roberts

From: Bennett, Jennifer D. [jennifer.bennett@snrdenton.com]
Sent: Thursday, March 31, 2011 10:57 AM
To: Andrea P Roberts
Cc: Google-PUM
Subject: RE: PUM v. Google

Andrea,

It has just come to our attention that the deposition cites in the Gopalratnam section of the attached letter are off by one page.

Thanks,

Jennifer D. Bennett
Senior Managing Associate
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From: Bennett, Jennifer D.
Sent: Tuesday, March 29, 2011 9:18 AM
To: 'andreaproberts@quinnemanuel.com'
Cc: 'Google-PUM@quinnemanuel.com'
Subject: PUM v. Google

Andrea,

Please see the attached correspondence.

Thanks,

EXHIBIT G

Andrea P Roberts

From: Andrea P Roberts
Sent: Friday, February 18, 2011 8:49 AM
To: Bennett, Jennifer D.
Cc: Google-PUM; rhorwitz@Potteranderson.com; Moore, David E.
Subject: RE: PUM v. Google

Jennifer,

Given the parties' prior communications, this task should have been completed before yesterday so that this dispute can be heard at next Tuesday's hearing. Indeed, at Mr. Gal's deposition last week, Mr. Freidman represented to David that your team would be re-reviewing the privilege log due to Mr. Gal's statements during the course of the deposition that certain documents could not have been privileged. Then, we expressed our concerns in writing via email on February 14 and asked for a written response from PUM. We did not receive a written response until Wednesday morning. In that response, PUM did not ask us to provide a list of the problematic entries. It was not until Wednesday's meet and confer that PUM asked for such a list. We agreed to provide it, but suggested that PUM begin its review by reviewing the entries specifically referenced during Mr. Gal's deposition. We have yet to receive a response regarding the entries identified during Mr. Gal's deposition, which is work that could have begun last week after his deposition.

We are disappointed that PUM's delay in taking action on this issue will delay in Google obtaining relief from the Court. That said, in an effort to avoid what will hopefully be unnecessary motion practice, if PUM provides a date certain as to when PUM will complete this project and confirm that, if PUM's review does not resolve the parties' disagreement, PUM will work with Google to promptly approach the Court for a discovery hearing date, we will not seek immediate relief from the Court.

Thanks,

Andrea

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bennett, Jennifer D. [mailto:jennifer.bennett@snrdenton.com]
Sent: Thursday, February 17, 2011 3:01 PM
To: Andrea P Roberts
Cc: Google-PUM; rhorwitz@Potteranderson.com; Moore, David E.
Subject: RE: PUM v. Google

Andrea,

As stated during our call yesterday, PUM agrees to go through each of these documents to re-assess the privilege claim, but PUM we will not be able to complete that task tonight. After we have finished this privilege review, PUM will produce any of the documents which were inadvertently called privileged.

Thanks,

Jennifer D. Bennett
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From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Thursday, February 17, 2011 1:36 PM
To: Bennett, Jennifer D.; Nelson, Mark C.; Friedman, Marc S.
Cc: Google-PUM; 'rhorwitz@Potteranderson.com'; Moore, David E.
Subject: PUM v. Google

Counsel,

Following up on yesterday's meet and confer, below is a list of privilege log entries from the Ari Gal, Pillsbury, and PUM privilege logs that do not appear to be privileged, based upon the descriptions and/or authors and recipients listed. Specifically, as we have discussed, these documents include Phil Black and/or Stefan Clulow who were counter-parties to transactions with Utopy and any documentation exchanged with them would not remain privileged, and we do not think the facts support your characterizations of their conduct to the contrary.

In any event, please let us know whether Mr. Gal and Pillsbury will produce the documents identified below. Given that we must file letter briefs with the Court by 1:30 pm Pacific time tomorrow, please let us know today so that we know whether we will need to seek relief from the court on this issue. Further, during our call yesterday, we suggested that PUM should begin its review of these documents by focusing on those raised during Mr. Gal's deposition. Please let us know if Mr. Gal or Pillsbury has changed their position as to any of those documents.

Ari Gal privilege log

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Pillsbury privilege log

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PUM privilege log

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496

Additionally, in your letter yesterday you indicated, numbers 87-89 are communications with counsel in anticipation of litigation. What litigation is referred to here? Thanks.

Andrea Pallios Roberts
Quinn Emanuel Urquhart & Sullivan, LLP

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EXHIBIT H

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