

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 06-60905-CIV-ALTONAGA/Turnoff

F & G RESEARCH, INC.,

Plaintiff,

vs.

GOOGLE, INC.,

Defendant.

**F & G RESEARCH, INC.'S FIRST SET OF DOCUMENT
REQUESTS AND THINGS TO GOOGLE, INC.**

Pursuant to the Federal Rules of Civil Procedure 34, Plaintiff, F & G Research, Inc. ("F&G"), propounds its First Set of Document Requests upon Defendant, GOOGLE, INC. ("Google"), and requests that Defendant provide its responses and materials of service herein for inspection and copying at the offices of Allen D. Brufsky, PA, 475 Galleon Drive Naples, Florida 34102, within thirty (30) days.

These requests are deemed to be continuing. With respect to any of the following requests or portions thereof to which Defendant, after answering, acquires additional knowledge or information, F&G requests that Defendant serve upon F&G amended or supplemental responses in accordance with Rule 26(e). Such amended or supplemental responses are to be served no more than forty-five-days after Defendant acquires such knowledge or information.

The Definitions and Instructions set forth below will apply to these requests for Documents and Things.

DEFINITIONS AND INSTRUCTIONS

As used herein and all further discovery requests, unless specified otherwise, the terms below shall be defined as follows:

(a) “YOU,” and “YOUR,” and each of them mean and refer to or “Google”, and any present or former agents, servants, officers directors, trustees, shareholders, representatives, subsidiaries and affiliates, its predecessors, and any individuals or entities, including attorneys, that at any time have acted or purported to act on behalf of “Google”.

(b) “REFER” shall be construed in the broadest sense to mean information which contains or comprises any communication, including representations, requests, demands, and the like which is the subject matter of a request, or discusses or mentions, whether directly or indirectly, the subject matter of the request.

(c) “RELATE or “RELATING” means supporting, concerning, relating to, referring to, reflecting, describing, evidencing, pertaining to, or constituting.

(d) “DOCUMENT” and “DOCUMENTS” shall be construed in the broadest manner permissible under the Federal Rules of Civil Procedure, including without limitation, any written, printed, typed, photostated, photographed, recorded, copied or otherwise reproduced communication or representation in your control, including letters, words, pictures, sounds or symbols, or combinations thereof. These terms include, but are not limited to, documents records, books, papers, contracts, memoranda, invoices, correspondence, notes, letters, facsimiles, minutes of meetings or conversations, policies

and procedures, calendar entries, ledger entries, diaries and journals, surveys, brochures, studies, reports, manuals, photographs, drawings, charts, maps, graphs, data compilations, other writings, microfilm, microfiche, audio recordings (including phono records, audio tapes, and audio disks), and video recordings (including film, video tapes, and video disks). These terms shall also mean electronic mail and any other information stored in electronic or magnetic form (including computer tapes, computer systems, computer disks, and computer memory, and including backup copies and deleted files on computers or computer storage devices or media). These terms shall include the original of a document, drafts of the document and each copy of the document that is not identical to any other copy. The terms shall also refer to physical or tangible things, such as models, samples, products and prototypes.

(e) “COMMUNICATION” or “COMMUNICATIONS” shall mean any communication regardless of the manner in which communications took place, including but not limited to, personal conversations, correspondence, electronic or computer mail, telephone calls, facsimile communications, or telegrams.

(f) “IDENTIFY” means and includes the name and address of the custodian of the document, the location of the document, and a general description of the document, including and requires you to provide: (1) the type of the document (i.e., correspondence, email, data base, memorandum, facsimile, etc.); (2) the general subject matter, number of pages, any attachments or appendices it includes of the document; (3) the date of the document; (4) the author of the document; (5) the addressee of the document; (6) all persons to whom it was distributed; and the (6) relationship of the author and addressee to each other.

(g) “ALL” shall mean “every” but shall also be construed to include the word “any.”

(h) “OEM” refers to “Original Equipment Manufacturer” and shall be construed in a broad sense, without limitation, as an equipment manufacturer including but not limited to the manufacture of equipment such as scrolling wheel computer mice and similar devices that is manufactured, designed, sold, packaged, re-designed, re-packaged, re-branded, for resale under an end-equipment manufacturer’s trademark or name.

(i) “ODM” refers to “Original Design Manufacturer” and shall be construed in a broad sense, without limitation, as an equipment manufacturer including but not limited to the manufacture of equipment such as scrolling wheel computer mice and similar devices that is manufactured, designed, sold, packaged, re-designed, re-packaged, re-branded, for resale under an end-equipment manufacturer’s trademark or name.

(j) The term “SOURCE CODE” shall consist of material that constitutes or contains non-public source code or documents revealing source code logic or algorithms of the producing party’s software for its GEO or Google Earth product .

REQUEST FOR PRODUCTION

1. All documents referring or relating to the SOURCE CODE to operate the Google Earth navigation compass graphic interface appearing on its software.

Dated: July 16, 2007
Naples, Florida

Respectfully submitted

/s/ Allen D. Brufsky
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239-963-9641 (Tel)
239-263-3441 (Fax)

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing is being served via e-mail and Fed Ex overnight courier this 16th, day of July, 2007, addressed to:

Ramsey M. Al-Salam

Perkins Coie LLP

1201 Third Avenue, suite 4800

Seattle, WA 98101-3099

And

Gregory L. Hillyer

Feldman Gale

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201 S. Biscayne Blvd.

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Attorneys for Defendant, GOOGLE, INC.

_____/s/ _allen d brufsky_____

Allen D. Brufsky

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