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 REQUESTS FOR ADMISSIONS TO DEFENDANT, GOOGLE,INC.

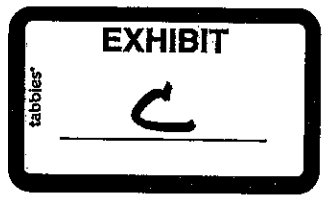
Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff F & G Research, Inc. ("F&G"), serves Defendant GOOGLE,INC. ("Google"), with the following requests for admissions.

Instructions and Definitions

Plaintiff requests Defendant, by a duly authorized officer thereof, within thirty (30) days after service of this request, admit or specifically deny for purposes of this action and subject to all pertinent objections as to admissibility which may be interposed during further proceedings, the truth of the following requests as follows:

1. You are required to admit or deny the following requested admissions.

2. If good faith requires you to qualify an answer or deny only part of a matter of which an admission is requested, you shall specify so much of it as is true and qualify or deny the remainder of the requested admission.



3. You may not give lack of information or knowledge as a reason for failure to admit or deny a requested admission unless you in good faith state that you have made a reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny the requested admission.

4. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

Requested Admissions

1. The source code relating to the operation of the Google Earth software carries out the execution of input scrolling commands to the graphic interface navigation compass to move a display associated with said navigation compass in response to a mouse cursor or other input device positioned on the navigation compass triggering such a command.
2. The source code is capable of executing movement of the display controlled by the navigation compass in an X(left-right),Y(up/down) and Z(in /out or zoom) direction on said display.
3. The source code will generate a command of variable sign and magnitude in response to the input command to the graphic interface navigation compass.
4. The source code will analyze a trail of the cursor of the input device at periodic time intervals, dynamically set a status variable according to a dominant axis of said cursor trail at said time intervals, and according to the status variable, set a scrolling axis to a direction option including an up/down option; a left-right option and an in-out option for movement on the display.

5. The source code will generate scrolling on the display along a scrolling axis determined by the status variable set as stated in request for admission 4 and according to a sign generated by the source code.
6. The patent in suit alleged to be infringed is valid.
7. There is no prior art known to Defendant which would anticipate the claimed inventions of the patent as defined by the claims.
8. There is no prior art known to Defendant which would render the claimed inventions of the patent in suit obvious to one of ordinary skill in the art.

Dated: July 16, 2007
Naples, Florida

Respectfully,

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Attorneys for Plaintiff, F & G Research, Inc.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing is being served via e-mail and Federal Express 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
Miami Center, 19th Floor
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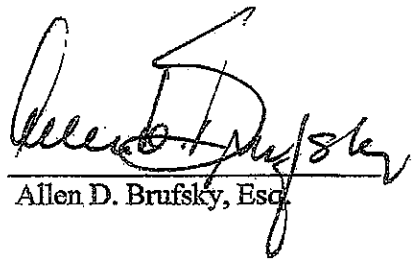
Attorneys for Defendant, Google, Inc.



Allen D. Brufsky, Esq.

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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 SUPPLEMENT TO FIRST REQUESTS FOR ADMISSIONS TO DEFENDANT, GOOGLE,INC.

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff F & G Research, Inc. ("F&G"), serves Defendant GOOGLE,INC. ("Google"), with the following requests for admissions.

Instructions and Definitions

Plaintiff requests Defendant, by a duly authorized officer thereof, within thirty (30) days after service of this request, admit or specifically deny for purposes of this action and subject to all pertinent objections as to admissibility which may be interposed during further proceedings, the truth of the following requests as follows:

1. You are required to admit or deny the following requested admissions.

2. If good faith requires you to qualify an answer or deny only part of a matter of which an admission is requested, you shall specify so much of it as is true and qualify or deny the remainder of the requested admission.

3. You may not give lack of information or knowledge as a reason for failure to admit or deny a requested admission unless you in good faith state that you have made a reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny the requested admission.

4. If a privilege not to answer is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

Requested Admissions

9. The source code relating to the operation of the Google Earth software carries out the execution of input scrolling commands to the graphic user interface navigation compass to move a view associated with said navigation compass in response to mouse events on the navigation compass triggering such a command.

10. In a context in which a user operates Google Earth with a two button mouse, said user placing said mouse cursor over the JOYSTICK SUB-ELEMENT OF THE NAVIGATION COMPASS, and said user moving said mouse in any direction away from its start position, below the joystick, while maintaining the left mouse button pressed, the source code is capable of executing movement of the view controlled by the navigation compass in an X(left-right),Y(up/down)direction on said view.

11. In a context in which a user operates Google Earth with a two button mouse, said user placing the mouse cursor over the JOYSTICK SUB-ELEMENT OF THE NAVIGATION COMPASS, and said user further moving said mouse in any direction away from its start position, below the joystick, while maintaining the left mouse button pressed, the source

code will generate a command of variable sign and magnitude in response to the input command to the graphic interface navigation compass.

12. In a context in which a user operates Google Earth with a two button mouse, said user placing said mouse cursor over the JOYSTICK SUB-ELEMENT OF THE NAVIGATION COMPASS, and said user further moving said mouse in any direction away from its start position below the joystick, while maintaining the left mouse button pressed, the source code will analyze all the "mouse events" related to "mouse is moved" captured by the graphic interface "navigation compass", and dynamically setting a status variable according to the position of the dominant axe of the "navigation compass" joystick, and according to said status variable, set a scrolling axis to a direction option including an up/down option; a left-right option and an in-out option for movement on the view.

13. In a context in which a user operates Google Earth with a two button mouse, said user placing said mouse cursor over the JOYSTICK SUB-ELEMENT OF THE NAVIGATION COMPASS, and said user further moving said mouse in any direction away from its start position below the joystick, while maintaining the left mouse button pressed, the source code will generate scrolling on the view along a scrolling axis determined by the status variable set as stated in request for admission 12 and according to "mouse events" of the type "mouse is moved" captured by the source code.

Dated: July 17, 2007
Naples, Florida

Respectfully,

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Attorneys for Plaintiff, F & G Research, Inc.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing is being served via e-mail and Federal Express overnight courier this **17th**, day of July, 2007, addressed to:

Ramsey M. Al-Salam
Perkins Coie LLP
1201 Third Avenue, suite 4800
Seattle, WA 98101-3099

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