

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHT RESPONSE, LLC

v.

GOOGLE INC., et al.

NO. 2:07-CV-371-CE

JURY

PLAINTIFF BRIGHT RESPONSE, LLC'S PROPOSED VERDICT FORM

In answering these questions, you are to follow all of the instructions I have given you in the Court's Instructions.

1. Did Bright Response prove by a preponderance of the evidence that Google infringes claims 28, 30, 31, 33 or 38 of the '947 patent?

Answer "Yes" or "No" for each Claim:

Claim Number	Infringed Literally?	Infringed under the Doctrine of Equivalents?
28		
30		
31		
33		
38		

2. Did Google prove by clear and convincing evidence that any of the listed claims of the '927 patent are invalid?

If you find the claim invalid by clear and convincing evidence answer “Yes.” Otherwise answer “No.”

Claim Number	Invalid?
28	
30	
31	
33	
38	

If you have found any claim infringed and valid (by answering “yes” in Question 1 for any claim and answering “no” in Question 2 for that same claim), then answer Question 3. Otherwise, do not answer Question 3.

3. What sum of money, if paid now in cash, do you find from a preponderance of the evidence would fairly and reasonably compensate Bright Response for Google’s infringement of the '927 patent?

Answer with the amount: \$ _____

YAHOO! INC.

4. Did Bright Response prove by a preponderance of the evidence that Yahoo infringes claims 28, 30, 31, 33 or 38 of the '947 patent?

Answer “Yes” or “No” for each Claim:

Claim Number	Infringed Literally?	Infringed under the Doctrine of Equivalents?
28		
30		
31		
33		
38		

5. Did Yahoo prove by clear and convincing evidence that any of the listed claims of the '927 patent are invalid?

If you find the claim invalid by clear and convincing evidence answer “Yes.” Otherwise, answer “No.”

Claim Number	Invalid?
28	
30	
31	
33	
38	

If you have found any claim infringed and valid (by answering “yes” for any claim in Question 4 and answering “no” for that same claim in Question 5), then answer Question 6. Otherwise do not answer Question 6.

6. What sum of money, if paid now in cash, do you find from a preponderance of the evidence would fairly and reasonably compensate Bright Response for Yahoo’s infringement of the ’947 patent?

Answer with the amount: \$ _____

AOL LLC AND AMERICA ONLINE, INC. (“AOL”)

7. Did Bright Response prove by a preponderance of the evidence that AOL infringes claims 28, 30, 31, 33 or 38 of the ’947 patent?

Answer “Yes” or “No” for each Claim:

Claim Number	Infringed Literally?	Infringed under the Doctrine of Equivalents?
28		
30		
31		
33		
38		

8. Did AOL prove by clear and convincing evidence that any of the listed claims of the '947 patent are invalid?

If you find the claim invalid by clear and convincing evidence answer “Yes.” Otherwise answer “No.”

Claim Number	Invalid?
28	
30	
31	
33	
38	

If you have found any claim infringed and valid (by answering “yes” for any claim in Question 8 and answering “no” for that same claim in Question 8), then answer Question 9. Otherwise do not answer Question 9.

9. What sum of money, if paid now in cash, do you find from a preponderance of the evidence would fairly and reasonably compensate Bright Response for AOL's infringement of the '947 patent?

Answer with the amount: \$ _____

10A. Do you find that Bright Response unreasonably delayed, and has no reasonable excuse for that delay, in bringing this lawsuit against Google?

Answer "yes" or "no."

10B. Do you find that Bright Response's unreasonable and unexplained delay, if any, in filing suit prejudiced or injured Google?

Answer "yes" or "no."

11A. Do you find that Bright Response unreasonably delayed, and has no reasonable excuse for that delay, in bringing this lawsuit against Yahoo?

Answer "yes" or "no."

11B. Do you find that Bright Response's unreasonable and unexplained delay, if any, in filing suit prejudiced or injured Yahoo?

Answer "yes" or "no."

12A. Do you find that Bright Response unreasonably delayed, and has no reasonable excuse for that delay, in bringing this lawsuit against AOL?

Answer "yes" or "no."

12B. Do you find that Bright Response's unreasonable and unexplained delay, if any, in filing suit prejudiced or injured AOL?

Answer "yes" or "no."

Signed this _____ day of August 2010:

JURY FOREPERSON