

# EXHIBIT L

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

PA ADVISORS, LLC

v.

GOOGLE, INC., et al.

No. 2:07-CV-480-DF

**PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION TO GOOGLE**

Pursuant to the Federal Rules of Civil Procedure, the Local Rules and the Court's Discovery Order, Plaintiff PA Advisors, LLC ("PA") serves these requests for production upon Defendant Google, Inc. ("Google"). Google must serve its responses, including responsive documents, upon counsel for PA within thirty days after service hereof.

DEFINITIONS AND INSTRUCTIONS

The definitions and instructions from PA's First Requests for Production are incorporated by reference. In addition:

28. "Intellectual Ventures" refers to Intellectual Ventures, LLC, any entities affiliated with Intellectual Ventures, LLC and their respective employees or agents.

DOCUMENT REQUESTS

99. All expert reports from any litigation in which you were a party that relate to the reasonable royalty or any damages for the infringement of any patent.

RESPONSE:

100. All declarations from any litigation in which you were a party that relate to the reasonable royalty or any damages for the infringement of any patent.

RESPONSE:

101. Copies of any trial or deposition transcripts from any litigation in which you were a party that relate to the reasonable royalty or any damages for the infringement of any patent.

RESPONSE:

102. All documents evidencing or mentioning agreements between you and Intellectual Ventures.

RESPONSE:

103. All documents evidencing or mentioning communications between you and Intellectual Ventures.

RESPONSE:

104. Documents sufficient to show all monies or consideration received by you for the licensing of any patent rights from 1999 to the present.

RESPONSE:

105. All business plans related to the development, acquisition and enforcement of patents.

RESPONSE:

106. Documents sufficient to show all expenditures, investments or costs related to research and development or any other technical or scientific pursuit by you or any entity under your control from 1999 to the present.

RESPONSE:

107. All documents or things that refer or relate to licensing rates for patents utilized by you and all other entities managed or owned by you.

RESPONSE:

108. All agreements, licenses, releases and covenants-not-to-sue that relate to the licensing of patent rights.

RESPONSE:

109. All documents or things that refer or relate to the lobbying (including activities that may or are intended to influence government policy) of any United States Government official

(including members of the United States Congress or their staff) with respect to patents, including an communications or contributions to The Coalition for Patent Fairness or other similar persons or entities and documents or things presented or received by Johanna Shelton, Policy Counsel and Legislative Strategist or Michelle Lee, Head of Patents and Patent Strategy, referred to at <http://googlepublicpolicy.blogspot.com/2007/09/reforming-patents-promoting-innovation.html>, which among other things, states: “We’ll be talking to House members and their staff this week to tell them just how important this is.”

RESPONSE:

November 3, 2008

Respectfully submitted,

PA ADVISORS, LLC

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COUNSEL FOR PLAINTIFF PA  
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### **CERTIFICATE OF SERVICE**

I hereby certify that this document is being served upon counsel for Google and Yahoo via e-mail on this date.

November 3, 2008

/s/ John J. Edmonds  
John J. Edmonds