

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

FPX, LLC d/b/a FIREPOND,	§	
	§	
	§	Civil Action No. 2:09-cv-00142-TJW
Individually and on Behalf of All Others	§	
Similarly Situated,	§	
	§	
Plaintiff,	§	CLASS ACTION COMPLAINT
	§	
v.	§	
	§	
GOOGLE, INC., YOUTUBE, LLC, AOL,	§	JURY TRIAL REQUESTED
LLC, TURNER BROADCASTING	§	
SYSTEM, INC., MYSPACE, INC. AND	§	
IAC/INTERACTIVECORP,	§	
	§	
Defendants.	§	

	§	
THE RODNEY A. HAMILTON LIVING	§	
TRUST and JOHN BECK AMAZING	§	Civil Action No. 2:09-cv-00151-TJW-CE
PROFITS, LLC, Individually and on Behalf	§	
of All Others Similarly Situated,	§	
	§	
Plaintiffs,	§	CLASS ACTION COMPLAINT
	§	
v.	§	
	§	
(1) GOOGLE INC.; AND	§	JURY TRIAL REQUESTED
(2) AOL LLC,	§	
	§	
Defendants.	§	

**DEFENDANT GOOGLE INC.’S SUPPLEMENTAL RESPONSE TO PLAINTIFFS’  
REQUEST FOR ADMISSION NO. 7**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Google Inc. (“Google”) hereby submits its Supplemental Response to Plaintiffs’ Request for Admission No. 7.

The following objections and response to Request No. 7 are expressly made subject to the Preliminary Statement and Objections Applicable to Plaintiffs' Instructions, Definitions, and All Requests ("General Objections") as set forth in Defendant Google Inc.'s Responses to Plaintiffs' First Set of Requests for Admissions, all of which are incorporated in the following objections and response to Request No. 7.

**REQUEST FOR ADMISSIONS NO. 7:** Admit that you have sold the term "John Beck's" as an AdWord or keyword.

**RESPONSE:** Google incorporates its General Objections as if fully set forth herein. Google further objects to this Request on the grounds that it is vague as to the term "sale" because no "AdWords" or keywords are sold through the Google AdWords program. Google also objects to this Request on the grounds that the term "AdWord," as used in the Request is vague and ambiguous.

Subject to and without waiving any of its objections, Google responds as follows:  
**Denied.** Google admits that the term "John Beck's" has been bid on as a keyword through the Google Adwords program.

Respectfully submitted,

/s/ Charles L. Babcock

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ATTORNEYS FOR DEFENDANT GOOGLE INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing **Defendant Google Inc.’s Supplemental Response To Plaintiffs’ Request For Admission No. 7** was served this 27th day of October, 2010, via Email, to the following:

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