EXHIBIT 14

From:	Amanda Bonn
Sent:	Wednesday, August 27, 2014 11:00 PM
To:	Andrea P Roberts; John Lahad; Shawn Blackburn; Justin A. Nelson; Cyndi Obuz; John Dolan; Kristin Malone; Max L. Tribble; Parker Folse; Stacy Schulze; Tammie J. DeNio; jrambin@capshawlaw.com; Elizabeth DeRieux; ccapshaw@capshawlaw.com; jw@wsfirm.com; claire@wsfirm.com; Meng Xi
Cc:	QE-Google-Rockstar; Mark Mann; blake@themannfirm.com; Andy Tindel
Subject:	RE: Rockstar v. Google - Source Code Inspection

Andrea,

I write regarding several deficiencies in Google's production of technical documents and source code.

Technical Document Production:

Google's 3.4 production has problems with fonts, OCR, images, metadata, etc., that make them unduly burdensome to search and review. In addition, Google's production appears incomplete in many respects.

(1) Many documents do not appear to have appropriate font-sizes or font-types and are not searchable. Due to the format of the production, we are finding it nearly impossible to search for (1) source code and technical content would have been inserted in the document and (2) text appearing within images, flow diagrams, and the like. For examples of image files that have not been produced in a searchable format, see Goog-WRD-00064041 and Goog-WRD-00010284. For examples of documents produced extremely small text (and, apparently as a result, poor OCR data), see Goog-WRD-00019878. Some documents appear to have OCR that does not match the document. For example, the corresponding OCR text for Goog-WRD-00019878 does not match the document's contents. Other documents, despite having text, appear to have no OCR data, such as Goog-WRD-00021332. Other OCR data appears corrupted as well, see Goog-WRD-00021623. For other documents, certain diagrams that seem to appear in the document are omitted, such as in Goog-WRD-0003158.

(2) In addition, it appears that Google has produced many documents in Native format (Document) rather than HTML converted to PDF from the internal Wiki portal, which means that there are many related documents for which we cannot identify that hot-links exist.

(3) As we have previously indicated, Google's limited production of metadata, combined with the volume of the production and the issue noted above, further burden our efforts to review the documents. You have agreed to provide the requested metadata for productions going forward. Please confirm that you will also provide such metadata for Google's 3.4 production.

(4) Finally, it appears to us—based on what we have been able to review, notwithstanding the above issues—that Google's production is incomplete in several respects. We have not been able to locate technical documents we would expect to find regarding the following:

   a. Search Systems:
      i. User query entry
      ii. Details of query processing to be presented to indexing systems
      iii. Ranking of search results
      iv. Search personalization
      v. Search re-ranking (or re-prioritization)
      vi. Search refinement

    vii. Other search platforms, including mobile platform, search partners (i.e., AOL), and custom search engine.
  b. Ads System:
    i. Ads database schema
    ii. Ranking of ads
    iii. Ads presented with search results on mobile platform
    iv. Ads provided to third-party partners such as AOL, etc
    v. Ads provided with CSE search results
    vi. User profile creation at various Google portals
    vii. User preference generation and editing (e.g. manual entry by user and logic that derives user profile)
    viii. User prior purchasing history identification and storage.

Please confirm that Google will provide a replacement production for the documents that have already been produced to address the searchability and readability issues discussed above. Please also confirm that either Google has produced technical documents regarding the above technical categories pursuant to its 3.4 obligations or else that it will do so promptly. If the former, please tell us the Bates ranges where we can find at least exemplar documents of the above so we can confirm that the documents have indeed been produced while we await a replacement production. If the latter, we expect Google to produce those documents promptly or we will move to compel.

Source Code Production Deficiencies:
Google's production of source code is selective, incomplete, and done in a fashion that it is unduly burdensome for our expert to review.

As an initial matter, the technical documents Google has loaded onto the source code review computer are in non-searchable PDFs. This makes it incredibly burdensome on our source code reviewer to find the relevant portions of documents while reviewing code. Please confirm that Google will load such documents in searchable format or in native for future code review sessions.

In addition, Google has produced source code and technical documents in an encrypted container. Decrypted code is presented in a temporary folder, so with a machine restart, the decryption process has to start again. This means all the open files lose the sync in the provided tools and have to be opened or the project has to be created again with every re-start of the system. This is unduly burdensome on our code reviewer(s).

Finally, Google's source code production is selective and incomplete in at least the following ways.

(1) Source code has not been produced in its end-to-end entirety, but appears to be highly selective files. As a result, Google has not produced source code to allow us to understand the end-to-end process for the accused instrumentalities. Several files that are referenced as "include" in the produced source code files are missing. Therefore, we do not have definition/logic for several functions that are called with the produced code. In addition, several files do not have corresponding .H or .CC files. This is unacceptable. Google's obligation is to produce <u>all</u> relevant source code for the accused instrumentalities, not a highly selective snapshot of source code.

(2) In addition, it appears Google has not produced code relating to:

  a. Search systems:
    i. End-to-end query processing that presents the user query to the indexing systems
    ii. Ranking of search results
    iii. Search personalization
    iv. Search refinement
    v. Rendering of search results

   vi. Search re-ranking (or reprioritization)

   vii. Code related to other search platforms like mobile, search partners (i.e., AOL), and Custom Search Engine.

  b. Ads System:

   i. Ranking of ads

   ii. Ads-serving with search results:

    1. Ads provided to third-party partners such as AOL

    2. Ads provided with CSE search results.

   iii. Re-prioritization of Ads

   iv. Source code related to user profile creation and editing using Google properties (e.g., at Google accounts, Google+, etc.)

   v. User preference generation and edit process (e.g., manual entry by user and logic related to derived preference as displayed in Ads Setting)

   vi. User prior purchase history identification and storing related logic

(3) Please also explain the content and motivation as to why the source code is produced in two different folders, Viz. P1-2014007-0970826056 and pull-tick-12971317 (where the second folder has a folder with the same version folder code.)

(4) Finally, thank you for producing certain DoubleClick source code. However, it appears that Google's production of DoubleClick code was highly selective as well—there appear to be only a selected 10-20 source code files from each version of DoubleClick between January and July 1996. Please produce all source code for any version of DoubleClick on which Google intends to rely immediately. In addition, Google has not produced any NetGravity code. Please produce all source code for any versions of NetGravity on which Google intends to rely.

Regards,

Amanda Bonn | Susman Godfrey LLP
1901 Ave. of the Stars, Suite 950 | Los Angeles, CA 90067
(T) 310-789-3131 | (M) 408-832-5193 abonn@susmangodfrey.com