

EXHIBIT R

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March 7, 2012

Charles Monterio
Dickstein Shapiro LLP
1825 Eye Street NW
Washington, DC 20006

Re: I/P Engine, Inc. v. AOL, Inc. et al.

Dear Charles:

I write to regarding your letter dated March 5, 2012.

In compliance with the parties' November 4, 2011 stipulation, I/P Engine provided initial non-infringement contentions on November 7 and 11 based on publicly available information. You agreed to supplement these contentions on February 17, 2012. In addition, I/P Engine incorporated its contentions into its responses to Interrogatory Nos. 5 and 7, referring to the contentions as "Pre-Discovery Infringement Contentions." These disclosures are what we already met and conferred about and would form the basis of our motion to compel. And while you now seek to backtrack from your statements and failure to engage on the call, we believe our summary of the call in our March 2, 2012 letter was accurate.

Google produced technical documents related to Google Search on December 7, 2012, three months ago. Your failure to review in a timely manner the documents produced in this case does not excuse your duty to supplement your infringement contentions, particularly in light of the fact that the documents we have provided show there is no infringement, as your failure to supplement demonstrates implicitly.

In your letter, you assert that IAC produced technical documents regarding Ask Sponsored

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Listings “only recently,” but IAC produced technical documents concerning ASL on January 17, 2012. I/P Engine has had these documents for seven weeks.

As we have indicated, the lack of clarity as to Plaintiff's reading of the patents prevents us from being able to supplement our invalidity contentions, if needed, based on them. As we have no further clarity on Plaintiff's contentions, there is no further art for us to identify in our invalidity contentions at this time, and, accordingly, nothing to compel.

Very truly yours,

A handwritten signature in blue ink that reads "Margaret P. Kammerud". The signature is written in a cursive style with a long horizontal stroke at the end.

Margaret P. Kammerud

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