

# EXHIBIT 13

## Jen Ghaussey

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**From:** Joshua Sohn  
**Sent:** Sunday, April 08, 2012 5:17 PM  
**To:** 'Monterio, Charles'; 'zz-IPEngine'  
**Cc:** QE-IP Engine; 'senoona@kaufcan.com'  
**Subject:** I/P Engine v. Google et al.: Claim Construction

Dear Charles,

I write regarding the parties' continued negotiations over proposed claim constructions. Regarding the order of steps for '420 claim 25, we understand Plaintiff takes the position that the "receiving collaborative feedback data" step must occur before the "combining pertaining feedback data with the content profile data" step. We agree. Please let us know whether plaintiff will also agree that the "scanning a network" step must occur before the "receiving the informons in a content-based filter system from the scanning system" step as required by the claim language. If not, please explain why.

Regarding the order of steps for '664 claim 26, we understand Plaintiff takes the position that the "combining" step must occur before the "filtering the combined information" step and that the "receiving information found to be relevant to the query by other users" step must occur before the "combining" step. We agree. However, we also seek Plaintiff's agreement that the "searching for information" step must occur before the "combining" step. The "combining" step requires combining "the information found to be relevant to the query by other users *with the searched information*". The "searched information" refers to the information obtained through the "searching for information" step. Thus, the "searching for information" step must occur before the searched information can be combined with anything else. Please let us know if Plaintiff agrees and, if not, why not.

Sincerely,

Josh