

EXHIBIT 15

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April 9, 2012

Via E-mail

David Perlson, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
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Re: Claim Construction

Dear David:

Further to my letter of April 5, 2012 and in response to your email of April 9, 2012, 1:37 PM ET, the potential list of terms to be construed, identified below, still exceeds the ten term limit set by the Court for claim construction.

1. “relevance”
2. “relevant”
3. “scanning a network”
4. “scanning system”
5. “collaborative feedback data”
6. “[feedback system for] receiving information found to be relevant to the query by other users”
7. “user”
8. “individual user” and “first user”
9. “combining”
10. “demand search”
11. “informon”
12. Antecedent basis
13. Separate systems issue
14. Order of steps for claim 25 of the ‘420 patent
15. Order of steps for claim 26 of the ‘664 patent

Your email of earlier today does nothing to reduce the number of terms, and instead simply reorganizes the terms into groupings with the effect of circumventing the Court’s clear limit of ten terms. Defendants must immediately pare the above list down to the Court ordered ten terms.

As we discussed during the meet and confer, I/P Engine is willing to consider compromise regarding certain proposed claim terms (as described below) but is not agreeable to Defendants’ proposed inappropriate groupings. As just one example, it is inappropriate to combine

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constructions for “collaborative feedback data” and “receiving information found to be relevant to the query by other users.” Defendants’ own definitions for these terms as proposed in their proposed constructions are wholly different and require completely different analyses.

I/P Engine provides the following comments in the spirit of compromise. The proposals contained below are made without prejudice in the event that the parties are unable to agree, in which event I/P Engine reserves its right to move forward with its prior proposed constructions, which it maintains are the correct interpretation of those terms.

With respect to the term “relevance,” I/P Engine proposes as a compromise construing the phrase “relevance to a query” to mean “how well an informon satisfies the individual user’s information need in the query.” Regarding Defendants’ proposed term “relevant,” I/P Engine proposes as a compromise construing the phrase “[informons/information] relevant to a query” to mean “[informons/information] having relevance to the [first/individual] user’s information need in the query.”

With respect to the term “user,” I/P Engine proposes as a compromise construing the term “user” to mean “an individual in communication with the network” for the ‘420 patent, and “an individual in communication with a network” for the ‘664 patent.” This proposed construction is consistent with the language Defendants proposed during our April 4, 2012 meet and confer.

Regarding the term “informon,” I/P Engine proposes as a compromise construing the term “informon” to mean “information entity of potential or actual interest to a [individual/first] user.” This proposal is consistent with our previous proposal to use “individual user” and “first user” consistently in the ‘420 and ‘664 patents respectively.

I/P Engine is willing to agree to these proposals in an effort to reduce the disputed claim terms to ten or fewer; however our willingness to compromise is predicated on Google’s immediate agreement to I/P Engine’s proposals.

In light of the looming opening claim construction brief due date, I/P Engine will assume for purposes of briefing that the parties intend to brief the following list of ten terms unless immediately told otherwise by Defendants.

1. “relevance”/”relevant”
2. “scanning a network”
3. “collaborative feedback data”
4. “[feedback system for] receiving information found to be relevant to the query by other users”
5. “combining”
6. “demand search”

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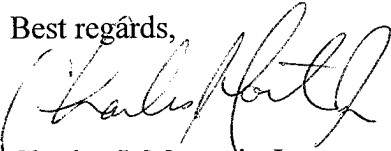
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7. "informon"
8. Separate systems issue
9. Order of steps for claim 25 of the '420 patent
10. Order of steps for claim 26 of the '664 patent

If the parties are in agreement on these ten terms or if the parties are able to reach an agreement on a list of ten terms before 6 PM ET today, then I/P Engine will withdraw its pending motion to compel or, in the alternative, motion for protective order today.

We further note that Defendants have recently proposed constructions for some terms that they had previously not done so (instead arguing those claim terms were indefinite), despite a Court Order compelling Defendants to do so. Defendants therefore are in violation of the Court' Order and I/P Engine intends to raise this issue with the Court unless Defendants immediately withdraw the proposed constructions that were not properly disclosed in accordance with the Court's Order.

Best regards,



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CJM/

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