

Exhibit 23

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

I/P ENGINE, INC.

Plaintiff,

v.

AOL, INC., *et al.*,

Defendants.

Civil Action No. 2:11-cv-512

**GOOGLE INC.'S SUPPLEMENTAL RESPONSES TO PLAINTIFF I/P ENGINE, INC.'S
SECOND SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Google Inc. hereby objects and responds in writing to I/P Engine, Inc.'s Second Set of Interrogatories as served on February 17, 2012.

GENERAL OBJECTIONS

Google hereby incorporates by reference the General Objections previously served and set forth in Google's Objections and Responses to Plaintiff's First Set of Interrogatories.

STATEMENT ON SUPPLEMENTATION

Google's investigation in this action is ongoing, and Google reserves the right to rely on and introduce information in addition to any information provided herein at the trial of this matter or in other related proceedings. Google has yet to receive complete discovery responses from I/P Engine. In addition, I/P Engine has yet to identify in a coherent way how it contends

Google infringes the asserted claims of the Patents-in-Suit. Google anticipates that facts it learns later in the litigation may be responsive to one or more of the interrogatories and Google reserves its right to supplement these interrogatories at appropriate points throughout this litigation without prejudice and/or to otherwise make available to I/P Engine such information. Google also reserves the right to change, modify or enlarge the following responses based on additional information, further analysis, and/or in light of events in the litigation such as rulings by the Court. Google reserves the right to rely on or otherwise use any such amended response for future discovery, trial or otherwise.

SPECIFIC OBJECTIONS AND RESPONSES

Google expressly incorporates the above objections as though set forth fully in response to each of the following individual interrogatories, and, to the extent that they are not raised in the particular response, Google does not waive those objections.

INTERROGATORY NO. 11

Identify each element of each Asserted Claim identified by I/P Engine in its Second Preliminary Disclosure of Asserted Claims and Infringement Contentions as to Google AdWords and Google AdSense for Search, served on February 17, 2012 (and any later supplementation or amendments thereof) that Google contends is not present in Google AdWords and/or Google AdSense for Search, and set forth in specific detail each fact, opinion, argument, inference and document that supports Google's contention (including the name, address, and telephone number of each person who has firsthand knowledge or possession of each such fact, opinion and document).

RESPONSE TO INTERROGATORY NO. 11:

Google incorporates here in response to this interrogatory its General Objections above by this reference. Google objects to this interrogatory on the grounds that: (i) it is overbroad and unduly burdensome; (ii) it is vague and ambiguous with respect to the phrase “each fact, opinion, argument, inference and document”; and (iii) it seeks information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Google further objects to this interrogatory on the ground that it seeks proprietary, trade secret or other confidential or competitively sensitive business information. Google will only produce such relevant, non-privileged information subject to adequate protections for Google’s confidential, trade secret and/or proprietary business or technical information via a protective order entered by the Court in this action. Google further objects to this interrogatory on the grounds that it is premature to the extent it calls for an expert opinion.

Subject to the foregoing general and specific objections, and despite the fact that Plaintiff has not adequately supplemented its infringement contentions, including its response to Google’s Interrogatory No. 7, Google responds that Google does not infringe any claim of the ‘420 or ‘664 Patents. Google further responds that the accused products do not meet at least the following limitations in the asserted claims:

‘420 Patent, Claim 10:

- “a system for scanning a network to make a demand search for informons relevant to a query from an individual user”
- “a content-based filter system for receiving the informons from the scanning system and for filtering the informons on the basis of applicable content profile data for relevance to the query”
- “a feedback system for receiving collaborative feedback data from system users relative to informons considered by such users”

- “the filter system combining pertaining feedback data from the feedback system with the content profile data in filtering each informon for relevance to the query”

‘420 Patent, Claim 14:

- “The system of claim 10 wherein the collaborative feedback data comprises passive feedback data”

‘420 Patent, Claim 15:

- “The system of claim 14 wherein the passive feedback data is obtained by passively monitoring the actual response to a proposed informon.”

‘420 Patent, Claim 25:

- “scanning a network to make a demand search for informons relevant to a query from an individual user”
- “receiving the informons in a content-based filter system from the scanning system and filtering the informons on the basis of applicable content profile data for relevance to the query”
- “receiving collaborative feedback data from system users relative to informons considered by such users”
- “combining pertaining feedback data with the content profile data in filtering each informon for relevance to the query”

‘420 Patent, Claim 27:

- “The method of claim 25 wherein the collaborative feedback data provides passive feedback data”

‘420 Patent, Claim 28:

- “The method of claim 27 wherein the passive feedback data is obtained by passively monitoring the actual response to a proposed informon”

‘664 Patent, Claim 1:

- “a scanning system for searching for information relevant to a query associated with a first user in a plurality of users”
- “a feedback system for receiving information found to be relevant to the query by other users”

- “a content-based filter system for combining the information from the feedback system with the information from the scanning system and for filtering the combined information for relevance to at least one of the query and the first user”

‘664 Patent, Claim 5:

- “The search system of claim 1 wherein the filtered information is an advertisement”

‘664 Patent, Claim 6:

- “The search system of claim 1 further comprising an information delivery system for delivering the filtered information to the first user”

‘664 Patent, Claim 21:

- “The search system of claim 1 wherein the content-based filter system filters the combined information relevant to both the query and the first user”

‘664 Patent, Claim 22:

- “The search system of claim 1 wherein the content-based filter system filters by extracting features from the information”

‘664 Patent, Claim 26:

- “searching for information relevant to a query associated with a first user in a plurality of users”
- “receiving information found to be relevant to the query by other users”
- “combining the information found to be relevant to the query by other users with the searched information”
- “content-based filtering the combined information for relevance to at least one of the query and the first user”

‘664 Patent, Claim 28:

- “The method of claim 26 further comprising the step of delivering the filtered information to the first user”

‘664 Patent, Claim 38:

- “The method of claim 26 wherein the searching step comprises scanning a network in response to a demand search for the information relevant to the query associated with the first user”

Google further responds that in accordance with Federal Rule of Civil Procedure 33(d), all or part of the non-objectionable discovery sought may be obtained from documents that have been produced in this litigation. Google reserves its right to supplement its response to this Interrogatory, including to reference relevant documents to the extent reasonable and during expert discovery.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11:

Subject to the foregoing general and specific objections, and without admitting that Google, Google AdWords, or Google AdSense for Search practice any element of any claim of the '420 Patent or the '664 Patent, Google incorporates herein its Response, Supplemental Response, and Second Supplemental Response to Plaintiff's Interrogatory No. 6. Google reserves the right to supplement its response to this interrogatory.

INTERROGATORY NO. 12

Set forth in specific detail each fact, opinion, argument, inference and document that supports any of Google's non-infringement contentions, if Google so contends, that Google AdWords and Google AdSense for Search do not Infringe the '420 or '664 patents as set forth by I/P Engine in its Second Preliminary Disclosure of Asserted Claims and Infringement Contentions as to Google AdWords and Google AdSense for Search, served on February 17, 2012 (and any later supplementation or amendments thereof), including the name, address, and telephone number of each person who has firsthand knowledge or possession of each such fact, opinion and document.

RESPONSE TO INTERROGATORY NO. 12:

Google incorporates here in response to this interrogatory its General Objections above by this reference. Google objects to this interrogatory on the grounds that: (i) it is overbroad and unduly burdensome; (ii) it is vague and ambiguous with respect to the phrase “each fact, opinion, argument, inference and document”; and (iii) it seeks information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Google further objects to this interrogatory on the ground that it seeks proprietary, trade secret or other confidential or competitively sensitive business information. Google will only produce such relevant, non-privileged information subject to adequate protections for Google’s confidential, trade secret and/or proprietary business or technical information via a protective order entered by the Court in this action. Google further objects to this interrogatory on the grounds that it is premature to the extent it calls for an expert opinion.

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SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12:

Subject to the foregoing general and specific objections, and without admitting that Google, Google AdWords, or Google AdSense for Search practice any element of any claim of the '420 Patent or the '664 Patent, Google incorporates herein its Response, Supplemental Response, and Second Supplemental Response to Plaintiff's Interrogatory No. 6. Google reserves the right to supplement its response to this interrogatory.

Dated: March 30, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2012, I will serve the foregoing by electronic mail to the following:

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Dated: March 30, 2012

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