# Exhibit 24

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February 9, 2012

**Via E-mail**

David Perlson, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

Re: Google's Response to I/P Engine's Interrogatory No. 6

Dear David:

You recently have made statements in emails and during meet and confers regarding a non-infringement theory that your clients have never disclosed in response to I/P Engine's Interrogatory No. 6. It is apparent that Google has developed a defense but not disclosed the factual basis for it to I/P Engine. Google, and your other clients, should immediately supplement their interrogatory responses.

In your email dated February 6, 2012, you stated that Google's technical production shows that "the accused products do not use collaborative filtering" and that "to the extent Plaintiff is going to continue its case, Plaintiff would need to interpret the patent in a way to eliminate collaborative filtering." During the February 7, 2012 meet and confer, you asserted that I/P Engine's contentions are absurd because you claimed that there was no basis for collaborative filtering. It is apparent that Google strongly believes that it has a non-infringement position related to "collaborative filtering." No such position has been disclosed in response to I/P Engine's Interrogatory No. 6. Your clients have a duty to supplement their responses to provide the basis for this contention.

I/P Engine, in Interrogatory No. 6 to Google, specifically requests that Google "identify and describe each basis for Google's contention that it is not a direct infringer, including, but not limited to all facts, documents, communications and/or events which Google contends are pertinent thereto." Google has had I/P Engine's detailed infringement contentions since November 7, 2011 and has had more than sufficient time to develop the factual basis for its apparent contentions of non-infringement. Similar interrogatories have been served upon your other clients in this action.

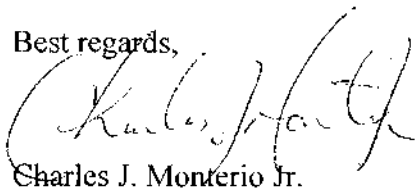
Google's existing response to Interrogatory No. 6 is plainly deficient. Despite Google's recent assertions, Google's response does not include any mention of "collaborative filtering" nor does it contain a *single* fact or document that would support *any* non-infringement position. As

Google is no doubt aware, a bare recitation that certain claim features are absent from its system is insufficient, and Google must supplement its responses to include facts and documents that form the basis of its non-infringement position. *See, e.g., Performance Pricing, Inc. v. Google, Inc. et al.*, No. 2:07-cv-0432 (E.D. Tex. May 27, 2009) (ordering Google to supplement its interrogatory responses to identify the facts and documents that form the basis of its non-infringement positions). I/P Engine requests that Google make good on its promise, in its response to Interrogatory No. 6, that it will "supplement its response to Interrogatory No. 6 to reference relevant documents to the extent reasonable."

Absent prompt supplementation, I/P Engine reserves its right to seek evidentiary sanctions for Google's continued withholding of information responsive to I/P Engine's Interrogatory No. 6. *See, e.g., Transclean Corp. v. Bridgewood Services, Inc.*, 290 F.3d 1364 (Fed. Cir. 2002) (affirming discovery sanctions that precluded the defendant from arguing non-infringement positions for failure to respond to interrogatories).

Please confirm that Google will be supplementing its response to Interrogatory No. 6 immediately. I/P Engine remains available for a meet and confer to discuss this issue.

Best regards,



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CJM/JLF

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