

EXHIBIT L

DICKSTEINSHAPIRO_{LLP}

1825 Eye Street NW | Washington, DC 20006-5403
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

January 24, 2012

Via E-mail

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

Re: January 17, 2011 Meet and Confer Teleconference

Dear David:

Thank you for your letter dated January 23, 2012. I/P Engine writes to respond, correct, and further clarify the meet and confer teleconference on January 17, 2012.

With respect to search terms and outstanding document productions, I/P Engine does not agree with your characterizations, as we were familiar with the comments of your January 9, 2012 letter. The parties have preliminarily agreed for Google to conduct custodial searches for Jeff Huber, Hal Varian, Jonathan Alferness, Bartholomew Furrow, Bryan Horling, Daniel Wright, Matt Kulick, Jonathan McPhie, and Rishi Khaitan using at least the following agreed-upon search terms:

- 5867799 or 5,867,799 or (799 /2 patent)
- '664 or 6,775,664 or 6775664 or 10/045,198
- '420 or 6,314,420 or 6314420 or 09/204,149
- pat* w/4 (664 or 420)
- appl* w/4 (198 or 149)
- I/P Engine
- (Andrew or Ken) w/3 Lang
- (Donald or Don) w/3 Kosak
- demand search
- scan /3 search /3 network
- (content based filter) or (content-based filter)
- collaborative feedback data
- informon
- Lycos
- content /2 profile

DICKSTEINSHAPIRO_{LLP}

David Perlson, Esq.

January 24, 2012

Page 2

- ((collaborative filter) or (collaborative filtering)) /10 ((content filter) or (content filtering))
- (hybrid /2 filter) or (hybrid /2 filtering)
- Wisewire

These search terms primarily relate to Google's knowledge of the patents-in-suit or Plaintiff. The first eight search terms solely relate to the patents-in-suit or Plaintiff. Seven of the next ten search terms are relevant terms used in the patents-in-suit; unless Google uses the exact same terms, they will not identify any documents other than those discussing the patents-in-suit. Two of the remaining terms are directed to corporate entities associated with the patents-in-suit. The last term, "hybrid filter" (or "hybrid filtering") is a term proposed by Google. For this reason, I/P Engine observed during the January 17th teleconference that Google's agreed-upon search terms primarily related to Google's knowledge and discussions of the patents-in-suit or Plaintiff, and not to Google's own business or documents. For this reason, I/P Engine asked Google how it proposed to search for documents responsive to all of I/P Engine's document requests that focused on issues other than Google's knowledge of the patents-in-suit or Plaintiff. Google's accusation that I/P Engine was unprepared is both incorrect and counterproductive to the objective of the call, which was establishing a list of helpful and useful search terms.

As I/P Engine stated during the January 17th teleconference, although I/P Engine agrees to the current list of Google custodians, it does not agree that this list is exhaustive and reserves the right to request additional custodians if warranted on a reasonable basis based upon information, documents, or things it discovers during a complete review of Google's document production, receives during discovery or obtains upon further investigation.

I/P Engine further understands from the call that Defendants are complying with their discovery obligations with respect to at least I/P Engine Document Request Nos. 26-30, 33-50 and 58-63, which correspond to non-technical related document requests independent of custodial searches such as Defendants' relevant financial information. I/P Engine expects the same with respect to I/P Engine's Document Request Nos. 64-75. I/P Engine also understood that Google would search for documents related to its discussions and/or analysis regarding the advertising systems of other defendants and third parties (Document Request Nos. 19 and 20) based on the previously provided applicable search terms.

Thus, what remained for discussion during our meet and confer was Google's obligations with respect to custodial searches relying upon Google-related technical search terms (e.g., I/P Engine Document Request Nos. 1-25, 31, 32 and 51-57). During the January 17th teleconference, Google requested that I/P Engine provide it with another proposed list of search terms. To further assist Google with its obligations, I/P Engine provides the requested listing of proposed search terms (below) for Google's custodial searches. I/P Engine's proposed search terms should not be interpreted as binding and/or exhaustive, and are preliminary and based upon an

incomplete review of Google's document production. I/P Engine provides the following list of search terms:

Term	Rationale
"Quality Score"	I/P Engine seeks information related to the "Quality Score" referenced on G-I/P Engine-0146189, e.g., how it is calculated, how it is represented, how it is used in the AdWords system, and how it is discussed at Google.
("LPQ" or "Landing Page Quality") and score	I/P Engine seeks information related to the "LPQ score" that is referenced on G-I/P Engine-0146189, e.g., how it is determined, represented, and discussed at Google. This score is used in "quality score" for disabling.
QBB w/5 pCTR	I/P Engine seeks information related to the "QBB pCTR" that is referenced on G-I/P Engine-0146189, e.g., how it is determined, represented, and discussed at Google. This score is used in "quality score" for disabling.
"Relevance score" or (Relevance and (Inventory or Ads Coverage))	I/P Engine seeks information related to the "Relevance" score that is referenced on G-I/P Engine-0146189, e.g., how it is determined, represented, and discussed at Google. It appears (based on the capitalization), that "Relevance score" is not a defined term at Google, so I/P Engine seeks documents mentioning the Inventory or Ads Coverage teams, who appear to be responsible for generating the quality score (but, of course, would not necessarily include their team name on documents). It appears that the Relevance score is determined by a system independent of the Quality Score calculations. I/P Engine is open to any suggestions by Google on how to best locate documents explaining how the score referenced on page G-I/P Engine-0146189 is determined and represented.
"Keyword spam score"	I/P Engine seeks information related to the "Keyword spam score" that is referenced on G-I/P Engine-0146189, e.g., how it is determined, represented, and discussed at Google. This score is used in "quality score" for disabling.
MEU	I/P Engine seeks information related to the "MEU" that is referenced on G-I/P Engine-0146187, e.g., how it is determined, represented, and discussed at Google.
MBU	I/P Engine seeks information related to the "MBU" that is referenced on G-I/P Engine-0146187, e.g., how it is determined, represented, and discussed at Google.

DICKSTEINSHAPIROLLP

David Perlson, Esq.

January 24, 2012

Page 4

Term	Rationale
Disabling and Ads	I/P Engine seeks information on “Disabling” in the ads system, as discussed on pages G-I/P Engine-0146186 to G-I/P Engine-0146190.
“Ads Quality”	I/P Engine seeks information on the “Ads Quality” team, which is described as “a group of over 100 Googlers who focus on maintaining (and improving) the relevance of our ads. In particular, we focus on search ads, as distinguished from content ads.” G-I/P Engine-0146186. This appears to be the team directly responsible for the “relevance” calculation.
SmartASS and DumbASS	I/P Engine seeks information on the similarities and differences, and testing results between these two systems.
SmartAss and pCTR	I/P Engine seeks information on how SmartAss computes a pCTR.
“Ad Shard”	I/P Engine seeks information on the architecture and use of “Ad Shards” as described on G-I/P Engine-0008819.
“Empirical Media”	I/P Engine seeks any Google discussions on the Empirical Media company.
Adwords and “User Feedback”	I/P Engine seeks information on where Google utilizes “user feedback” in AdWords.
(Click-through or clickthrough or CTR or “click through”) and (Adwords)	I/P Engine seeks information on where Google utilizes “CTR” in AdWords.
“Virtuous Circle”	I/P Engine seeks information relevant to Google’s use of this term.
“Relevance” and “holy grail”	I/P Engine seeks information relevant to Google’s use of this term.
“Conversion rate”	I/P Engine seeks information relevant to Google’s use of this term.
“revenue per search”	I/P Engine seeks information relevant to Google’s use of this term.
coverage	I/P Engine seeks information relevant to Google’s use of this term.
depth	I/P Engine seeks information relevant to Google’s use of this term.
“cost per click” or CPC	I/P Engine seeks information on where Google utilizes “CPC” in AdWords.

I/P Engine reserves the right to reasonably request additional custodians and/or search terms based upon information, documents, or things it discovers during a complete review of Google’s

DICKSTEINSHAPIRO LLP

David Perlson, Esq.

January 24, 2012

Page 5

document production, receives during discovery or obtains upon further investigation. For example, Google has yet to identify any allegedly non-infringing alternatives in support of its defenses. If Google does make such identifications, I/P Engine reserves the right to modify and/or append the search terms and custodians to capture relevant information based on such purportedly non-infringing alternatives. Further, Google has yet to produce patent licenses in response to I/P Engine's document requests or identify which, if any, allegedly comparable licenses it intends to rely upon to support its defenses (discussed above); thus I/P Engine also reserves the right to modify and/or append the search terms and custodians to capture relevant information based on any such identification.

With respect to anticipated document productions, I/P Engine received IAC's document production of January 17, 2012. I/P Engine understands that it should receive document productions including deposition transcripts from prior litigations (as discussed below) and relevant licensing agreements in the next couple of weeks. According to your January 23rd letter, Google will produce Google revenue data this week.

I/P Engine is very concerned about the slow pace of production. Based on Google's comments during the January 17th teleconference, I/P Engine understands that there are no other anticipated Google document productions in the short term "pipeline" although there are numerous outstanding document requests that are not dependent upon the search term discussion between the parties. Unless Google is able to offer concrete production dates for all of its pending productions, we intend to raise this issue at the Rule 16(b) conference on February 13, 2012.

With respect to Google's Interrogatory No. 1, I/P Engine reiterated that it has previously explained its positions. I/P Engine has explained why it was appropriate to review the Lycos and Mr. Lang third party document productions in connection with activities occurring at or near the time of the inventors' work with Lycos. I/P Engine is not causing an "inappropriate delay" as mentioned in your January 23rd letter. Instead, I/P Engine intends to review the third party documents provided by Mr. Lang and Lycos (some of which were held by Google for a week before being produced on a pass-along basis to I/P Engine) before supplementing its response regarding the date of conception or any reduction to practice. We currently are reviewing those documents and will timely supplement.

Regarding Google's Interrogatory No. 7, I/P Engine explained that it has previously articulated its positions. Additionally, I/P Engine noted its position that the second sentence of your January 13, 2012 letter stating "Google agreed . . . it would produce technical documents on an expedited basis in order to then receive more robust supplemental infringement contentions early in the case based on those technical documents" was incorrect. The agreement between the parties is articulated in the November 4th Stipulation, and is as follows: I/P Engine providing its early preliminary identified asserted claims and claim charts (*see* paragraphs 1, 2 and 4), Defendants' providing technical document productions for each system identified by I/P Engine's claim

DICKSTEINSHAPIRO_{LLP}

David Perlson, Esq.

January 24, 2012

Page 6

charts (*see* paragraphs 3, and 6), the opening of written discovery for all parties (*see* paragraphs 3, 5 and 7), and Defendants' agreement to not seek transfer (*see* paragraph 8) and to file their Answers (*see* paragraph 9). There never was any discussion of "more robust supplemental infringement contentions early in the case based on those technical documents", and the parties did not agree in the November 4, 2011 Stipulation based upon such an unarticulated expectation. I/P Engine will, however, supplement its claim charts once it has finished its review of Google's technical documents is complete. I/P Engine has proposed a date certain for such supplementation in its Proposed Discovery Plan, previously provided under separate cover.

Regarding Google's prior litigation documents, I/P Engine is familiar with your January 13th response and Google's avoidance of taking a position. I/P Engine understands that Google is producing deposition transcripts from current and former Google employees from certain (as yet unidentified) AdWords litigations regarding aspects of the technology that Google unilaterally considers to be similar to those accused in this case, non-infringement expert reports from those cases, and Google-specific portions of the Bright Response trial transcript, as mentioned in its January 13th letter. We note that Google previously agreed to produce some of those documents in its email of December 21, 2011 and has yet to produce them even though more than a month has passed. In that email, Google agreed to produce the following:

- Deposition transcripts of current or former Google employees for the following cases:
 - *Paid Search Engine Tools, LLC v. Yahoo! Inc., et al.*, Case No. 2:07-cv-403 (TJW), United States District Court for the Eastern District of Texas, Marshall Division
 - *Bid for Position, LLC v. AOL, LLC, et al.*, Case No. 2:07-cv-582-RGD/TEM, United States District Court for the Eastern District of Virginia
 - *Performance Pricing, Inc. v. Google Inc., et al.*, Case No. 2:07-cv-432-RRR, United States District Court for the Eastern District of Texas, Marshall Division
 - *Bright Response, LLC F/K/A Polaris IP, LLC v. Google Inc., et al.*, Case No. 2:07-cv-371-TJW-CE, United States District Court for the Eastern District of Texas, Marshall Division
 - *PA Advisors, LLC v. Google Inc., et al.*, Case No. 2:07-cv-480-DF, United States District Court for the Eastern District of Texas, Marshall Division
 - *Personalized User Model, LLP, v. Google Inc.*, Case No. 09-525-LPS, United States District Court for the District of Delaware
- Non-infringement expert reports in the above stated cases

DICKSTEINSHAPIRO_{LLP}

David Perlson, Esq.

January 24, 2012

Page 7

- Expert deposition transcripts from experts on non-infringement

In our email on December 22, 2011, to further assist Google in the production of additional prior litigation documents, I/P Engine provided the following list of additional prior AdWords litigations:

- *Paid Search Engine Tools LLC v. Google Inc. and Microsoft Corp.*, 08-cv-061 (TXED)
- *Paid Search Engine Tools LLC v. Google Inc. et al.*, 2:11-cv-00306 (TXED)
- *Function Media LLC v. Google Inc. and Yahoo Inc.*, 2:07-cv-279 (TXED)
- *Overture v. Google* (CDCA) 2002
- *Xerox Corp. v. Google Inc. et al.*, 1:10-cv-00136 (D.Del)
- *Walker Digital LLC v. Axis Communications AB et al.*, 1:11-cv-00558 (D.Del)
- *Desenberg v. Google Inc.*, 08-cv-10121 (SDNY)

Although some of Google's comments during the January 17th teleconference led I/P Engine to believe that Google does not believe all of these litigations are relevant to the issues in the present litigation, Google has yet to identify which of these litigations are not relevant. I/P Engine requests that Google produce documents from all of these litigations (*see* I/P Engine Document Request No. 49). For all identified relevant prior AdWords litigations (the six agreed-upon above plus any additional relevant ones from the second list), I/P Engine reiterates its request for production of the following litigation documents (as requested in I/P Engine Document Request No. 50 and in our December 16, 2011 email):

- Google discovery responses (discovery responses)
- Dispositive pleadings (contentions)
- All pleadings to which was attached a declaration from a current or former Google employee (contentions)
- All hearing and trial transcripts (trial transcripts)
- All fact deposition transcripts of current or former Google employees (deposition transcripts)
- All expert reports (expert reports)

DICKSTEINSHAPIRO LLP

David Perlson, Esq.

January 24, 2012

Page 8

- All expert deposition transcripts (deposition transcripts)
- All judgments
- All appellate briefs and orders (contentions)
- All settlement agreements
- Motions in limine pleadings
- Pretrial orders
- Rule 50/59 motion pleadings (contentions)
- Daubert pleadings

Regarding third party document productions, I/P Engine received Lycos' January 10, 2012 document production on January 19, 2012, and awaits any received document production from the Palo Alto Research Center, which was due January 16, 2012.

With respect to our discussions regarding a deposition proposal, the parties have been unable to reach agreement regarding the number of fact depositions. I/P Engine believes that, in addition to a Rule 30(b)(6) deposition on liability issues, and on damages issues, it should have the right to depose each fact witness affiliated with a defendant and who has been disclosed pursuant to Rule 26(a) (currently 14 individuals for all defendants). Defendants will not agree to depart from the ten deposition limit at this time, although they have indicated that they may not oppose a request to exceed that if in their sole determination they believe such a request is reasonable. I/P Engine intends to file a motion in connection with the Rule 16(b) conference seeking leave to take one 30(b)(6) deposition for liability for each defendant, one 30(b)(6) deposition for damages for each Defendant, and fact depositions of each Defendant equal to the number of individuals that the specific Defendant's 26(a)(1) disclosure lists as people likely to have discoverable information, including any individuals disclosed in subsequent supplemental disclosures. I/P Engine understands, based upon your January 23rd letter, that Google may oppose this motion, although Google has not taken a definitive position. Please provide Defendants' definitive position by no later than January 27, 2012.

We discussed Lycos' most recent third party document production. As we mentioned during the January 17th teleconference, we are investigating the nature of Lycos' comments in its January 10, 2012 letter. We will respond to Google's questions under separate cover.

DICKSTEINSHAPIROLLP

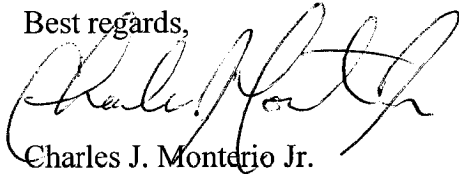
David Perlson, Esq.

January 24, 2012

Page 9

Please do not hesitate to contact us if you have any questions.

Best regards,



Charles J. Monterio Jr.

(202) 420-5167

MonterioC@dicksteinshapiro.com

CJM/

cc: Stephen E. Noona
David Bilsker
Kenneth W. Brothers
Jeffrey K. Sherwood
DeAnna Allen