

# EXHIBIT P

March 16, 2012

Charles Monterio  
[MonterioC@dicksteinshapiro.com](mailto:MonterioC@dicksteinshapiro.com)

Re: I/P Engine, Inc. v. AOL, Inc. et al.

Dear Charles:

I write in response to your March 9, 2012 letter regarding search terms. We continue to disagree regarding the relevance of many of the terms that you propose, as well as the likelihood that the documents collected by those terms will lead to the discovery of admissible evidence. However, in the interest of compromise and to resolve this issue and move forward with document production in the case, we propose the following:

As you know, Google has agreed to many search terms, as outlined in our letters of January 23, February 13, and March 7. In addition to the terms that Google has already agreed to, Google agrees to the following terms:

“QBB” w/5 “pCTR”  
“Keyword spam score”  
“Ad Shard”  
“Empirical Media”  
“Virtuous Circle”  
“Relevance” and “holy grail”  
“revenue per search”

Additionally, Google ran searches on the following terms and determined that the following

**quinn emanuel urquhart & sullivan, llp**

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terms are too broad or otherwise problematic:

(“LPQ” or “Landing Page Quality”) and “score”  
Disabling and Ads  
“Relevance score” or (Relevance and (Inventory or Ads Coverage))

We would propose modifying the terms as follows:

(“LPQ” or “Landing Page Quality”) w/3 “score”  
“Disabling” w/3 “Ads”  
 (“Relevance” or “Relevance Score”) w/5 (“Inventory” or “Ads Coverage”)

We reserve our rights as to these terms, and all terms that Google has agreed to, in the event that they later result in burdensome numbers of hits for any custodian. Please confirm that Plaintiff is agreeable to these minor modifications to these terms. Please also confirm that you agree to withdraw the terms MEU and MBU in light of Google’s agreement to the terms as outlined above.

Finally, we note that Plaintiff’s request for the term “conversion rate” is without merit. In your request to include the term “conversion rate,” you point to a Google document regarding “Improving your conversion rate.” As outlined in that document, conversion tracking is a method for the advertiser to determine the amount of people clicking on its ads that actually purchase a product. In other words, the advertiser’s ability to track its conversion of clicks on its ad to actual sales. This feature of AdWords has not been accused of infringement, and is unrelated to those elements of AdWords that have been accused. We therefore will not include this term in the search list.

As always, we remain willing to meet and confer to resolve any discovery issues, and hope that you similarly remain willing to work together on these issues in a timely and efficient manner.

Sincerely,



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