

EXHIBIT C

Jen Ghaussy

From: David Perlson
Sent: Tuesday, December 20, 2011 4:52 PM
To: David Perlson; Margaret P. Kammerud; Brothers, Kenneth; zz-IPEngine
Cc: QE-IP Engine; senoona@kaufcan.com
Subject: RE: I/P Engine v. AOL et. al.

Ken,

Below is our proposal for custodial searching. We propose running custodial searches unrestricted by time, but subject to reasonable search terms, for each of the individuals listed below. We also have included a proposed set of search terms below. However, we still need to test these terms on a data set (such as one custodian) before running on all custodian files. To the extent the tests result in the need to adjust these terms based on the results (for example if they return an unreasonable number of irrelevant hits) we will let you know.

To the extent that you have other proposed custodians (as we asked Friday) or search terms you would like us to consider, please do so now. As we have previously stated, we intend to do our custodial collection only once. If there are additional custodians you would like to add, please promptly identify those custodians so we can meet and confer about your proposed additions before Google undertakes the collection, review, and production of custodial documents, not after the process has begun. While we will not preclude additional custodial searches under limited circumstances later in the case as appropriate, we will likely object to the addition of custodians of whom you could have known about had you reviewed Google's extension production of technical documents already in the case.

David

Custodians:

Jonathan Alferness, Director, Product Management

Bartholomew Furrow, Software Engineer

Bryan Horling, Software Engineer

Daniel Wright, Software Engineer

Matt Kulick, Product Manager

Jonathan McPhie, Product Manager

Rishi Khaitan, Product Manager

Search Terms:

6775664 or 6,775,664 or (664 /2 patent)

6314420 or 6,314,420 or (420 /2 patent)

I/P Engine

(Andrew /2 Lang) or (Ken /2 Lang)

Donald /2 Kosak

demand search

scan /3 search /3 network

(content based filter) or (content-based filter)

collaborative feedback data

informon

Lycos

content /2 profile

((collaborative filter) or (collaborative filtering)) /10 ((content filter) or (content filtering))

(hybrid /2 filter) or (hybrid /2 filtering)

From: David Perlson

Sent: Friday, December 16, 2011 5:50 PM

To: David Perlson; Margaret P. Kammerud; Brothers, Kenneth; zz-IPEngine

Cc: OE-IP Engine; senoona@kaufcan.com

Subject: RE: I/P Engine v. AOL et. al.

Ken, as we indicated we will look identify Google custodians. Now that Plaintiff has Google's initial production of technical documents Plaintiff should be able to identify propose custodians as well. Please do so. We want to avoid searching custodial documents and then having Plaintiff come back later and asking for more custodians as much as possible.