

EXHIBIT G

WRITER'S DIRECT DIAL NO.
(415) 875-6316

WRITER'S INTERNET ADDRESS
megkammerud@quinnemanuel.com

January 13, 2012

VIA E-MAIL

Charles Monterio Jr.
Dickstein Shapiro LLP
1825 Eye Street NW
Washington, DC 20006

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

Dear Charles:

I am writing in regard to your January 10 letter concerning Google custodians and proposed search terms.

I. Search Terms

Your letter did not respond to any of our points regarding the overly broad search terms you had proposed. More than a month ago we produced Google's technical documents for the accused systems, so Plaintiff should now be able to formulate reasonable, targeted search terms relevant to its case. It is inappropriate for I/P Engine to refuse to supplement its infringement contentions based on Google's technical documents and refuse to provide search terms with any more specificity than the names of the accused products, then assert that it is somehow "clear which documents I/P Engine seeks." Please respond to the detailed concerns articulated in my January 9 letter and provide a set of targeted search terms for consideration.

Further, we disagree with your assertion that Google's proposed terms are limited to Google's

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100
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LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100
TOKYO | NBF Hibiya Bldg., 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712
MANNHEIM | Erzbergerstraße 5, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100

knowledge of the asserted patents. We carefully crafted our proposed terms to retrieve documents, to the extent they exist, relevant to the concepts presented in the asserted patents.

II. Custodians

We continue to maintain that it is highly unlikely that Jeff Huber and Hal Varian will have information in their custodial files that would warrant a custodial search for them. However, Google is willing to produce custodial documents from Jeff Huber and Hal Varian as well as the Google custodians we have previously identified (Jonathan Alferness, Bartholomew Furrow, Bryan Horling, Daniel Wright, Matt Kulick, Jonathan McPhie, and Rishi Khaitan), if I/P Engine will agree not to seek documents from any additional Google custodians. Any custodial search of Mr. Huber's documents would be limited to the time period before April 2011, during which he worked on the company's advertising and monetization systems. Mr. Huber switched roles in the company in April, and his current work as Vice President, Commerce and Local is irrelevant to this litigation. Also, we believe the custodial documents searched will include documents concerning the testing of AdWords, including the transition from DumbASS to SmartASS.

We do not, however, agree to the inclusion of Jack Ancone as a document custodian in this case. While he has testified as Rule 30(b)(6) witness in the past on licensing issues, his day to day job is in business development. Thus, he would not have relevant documents.

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. Dealing with custodians and search terms is an area in which we particularly need to work together. However, we need Plaintiff to be reasonable and practical. Again we ask that you please go back and evaluate your search terms and revise them to be tailored to this case so we may have a meaningful discussion on this issue.

Very truly yours,



Margaret P. Kammerud