

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC.,

Plaintiff,

v.

AOL, INC. et al.,

Defendants.

Civ. Action No. 2:11-cv-512

**REPLY IN SUPPORT OF PLAINTIFF I/P ENGINE'S MOTION TO COMPEL
GOOGLE'S CUSTODIAL DOCUMENT PRODUCTION**

Google's document production responsive to I/P Engine's document requests, which were served November 7, 2011, was due 30 days after the request, therefore, it is 138 days late. The only question is how long Google should be permitted to drag out its production of documents. Google admits in its Opposition (at 7, 8, and 11) that, several weeks ago, it collected 115,000 documents relating to its nine employees that are the agreed-upon custodians. This averages approximately 12,750 documents per custodian. Google states that it has 55 attorneys reviewing these documents. Opposition at 11. If each member of Google's document team looked at 230 documents in a day, then that team could complete the review for a single

custodian in a single day.¹ Google's team could have completed its review of the 115,000 documents in 9 days – well before Google filed its opposition brief.²

Dated: April 23, 2012

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¹ Google says the average length of each document is 2.5 pages. Opposition at 12. A typical document reviewer can look at about 50 documents per hour. Each member of Google's document review team only needs less than 5 hours to review 230 documents.

² Google admitted (at 8) that it had all 115,000 of the documents ready for review by no later than April 6. Of course, it has known that the files of the nine custodians would be searched for relevant documents since January 2012, when the parties agreed upon the nine custodians.

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April, 2012, the foregoing **REPLY IN SUPPORT OF PLAINTIFF I/P ENGINE'S MOTION TO COMPEL GOOGLE'S CUSTODIAL DOCUMENT PRODUCTION**, was served via the Court's CM/ECF system, on the following:

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