

EXHIBIT L

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Via E-mail

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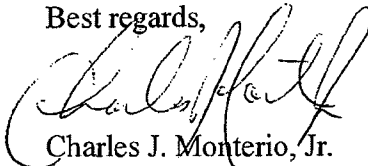
Re: 30(b)(1) Deposition Count

Dear Emily:

Further to the Court's order and Judge Stillman's advice on Friday that the parties resolve this issue, we write to propose a solution to the issue of the number of 30(b)(1) depositions in this case. With respect to 30(b)(1) depositions, we propose that I/P Engine take a number of fact depositions for each Defendant that is equal to the number of individuals listed in the respective initial disclosures for that Defendant. This would be a total of 14 individual fact witness depositions: 3 for Google, 5 for AOL, 2 for Gannett, 3 for IAC, and 1 for Target. Please advise whether Defendants agree to this proposal.

Please also reconfirm that Mr. Derek Cook is being made available for deposition and the date.

Best regards,



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CJM/

cc: Stephen E. Noona
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