

EXHIBIT W

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Via E-mail

David Perlson, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

Re: Target's, Gannett's and IAC's Objections to I/P Engine's 30(b)(6) Notices of Deposition

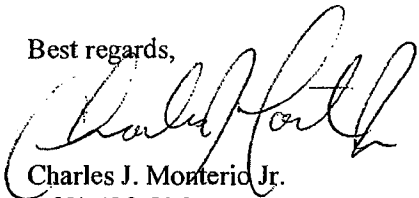
Dear David:

I/P Engine received Target's, Gannett's and IAC's (collectively "Defendants") objections to I/P Engine's 30(b)(6) Notices of Deposition. As we have advised you, I/P Engine considers Defendants' objections and responses untimely; under Local Rule 26, any objection to discovery requests must be served within 15 days after service. I/P Engine notes that Defendants' objections to I/P Engine's Liability and Damages 30(b)(6) Notices are the same. Please distinguish between record objections, and objections on which Defendants intend to rely upon to substantively limit the testimony of its designees.

With respect to I/P Engine's Liability 30(b)(6) Notice, it appears that Defendants intend to not produce a corporate designee in response to topics 8-17. Regarding I/P Engine's Damages 30(b)(6) Notice, it appears that Defendants intend to not produce a corporate designee in response to topics 4-11. We will confirm this apparent impasse during today's meet and confer.

We intend to proceed with these depositions before Google's 30(b)(6) deposition, and on the liability issues first. We intend to confirm during today's meet and confer that Defendants' refusal to designate any witnesses on any topics has created an impasse.

Best regards,



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CJM/

cc: Stephen E. Noona
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