

# EXHIBIT E

## DICKSTEINSHAPIRO<sub>LLP</sub>

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May 22, 2012

### Via E-mail

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

Re: Derek Cook 30(b)(1) Deposition

Dear Jen:

I write in response to your letter dated May 16, 2012 regarding the deposition notice to Derek Cook served on May 11. We apologize for any miscommunications regarding depositions. Our intention is to take 30(b)(6) depositions on liability and damages for each defendant, and to take a limited number of 30(b)(1) depositions. The parties previously discussed 30(b)(6) depositions on liability and damages for each defendant, and fourteen aggregate 30(b)(1) depositions. For 30(b)(1) depositions, we plan to take no more than that number, and in all likelihood will take fewer than that. As I/P Engine has yet to take one fact deposition; we do not believe that any issue currently exists. But to avoid more motion practice, we are nevertheless willing to reopen this discussion with Defendants to arrive at a resolution relating to the number of 30(b)(1) depositions.

Based upon the documents that we have reviewed, however, we cannot limit our 30(b)(1) depositions to only those individuals identified in Defendants' Initial Disclosures. Based upon our review, we have identified other individuals that appear to have unique and relevant knowledge relating to the issues in this litigation. Mr. Cook is one of those individuals. For example, he appears to be a lead engineer who has worked, and is still working, on the specific, relevant portions of the AdWords system.

**DICKSTEINSHAPIRO**LLP

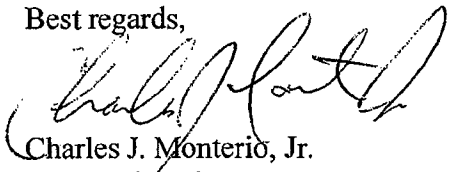
Jen Ghaussy, Esq.

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We are willing to meet and confer on the issue of the number of depositions, and propose having a meet and confer on Thursday, May 24, 2012 at 4 PM ET. As I/P Engine has yet to take any depositions in this case, however, we request that a date for Mr. Cook's deposition be provided while the parties work to resolve the deposition-number issue.

Best regards,



Charles J. Monterio, Jr.

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CJM/

cc: Stephen E. Noona  
David Bilsker  
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