

EXHIBIT F

quinn emanuel trial lawyers | san francisco

50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL: (415) 875-6600 FAX: (415) 875-6700

May 23, 2012

Charles Monterio
monterioc@dicksteinshapiro.com

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

Dear Charles:

I write in response to your letter of May 22, 2012 regarding Plaintiff's Notice of Deposition to Derek Cook. You state that the parties previously discussed "fourteen aggregate 30(b)(1) depositions of Defendants." As noted in my letter of May 16, the parties had agreed to "the right to depose each fact witness affiliated with a defendant and who has been disclosed pursuant to Rule 26(a)." It was those specific, previously disclosed, fourteen witnesses that Defendants agreed to have deposed in their individual capacity.

While we are willing to consider individual depositions of different employees of the Defendants, including your requested deposition of Mr. Cook, we need to discuss Plaintiff's intentions with respect to future depositions. For example, does Plaintiff no longer intend to take fact depositions of some or all of the witnesses listed in Google's initial disclosures (or that of other defendants)? Is Plaintiff at this time aware of other employees of Defendants that Plaintiff intends to notice for deposition? As I'm sure you can understand, we want to be sure that if we agree to the deposition of Mr. Cook we are not opening a Pandora's Box regarding depositions of the defendants beyond what was agreed.

We are not available to meet and confer on May 24 at 4 PM ET, but would be available at 4 PM ET on Friday, May 25. Please let us know if this date and time would work for you.

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

NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

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WASHINGTON, DC | 1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004-2400 | TEL (202) 538-8000 FAX (202) 538-8100

LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712

MANNHEIM | Mollstraße 42, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100

MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

Sincerely,

A handwritten signature in blue ink, appearing to read "Jen Ghaussy". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Jen Ghaussy

cc: IPEngine@dicksteinshapiro.com
QE-IPEngine@quinnemanuel.com