

EXHIBIT G

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May 29, 2012

Via E-mail

Emily C. O'Brien, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111

Re: Outstanding Google Discovery Obligations

Dear Emily:

Further to our meet and confer of May 25, 2012, I/P Engine is writing to summarize our understandings as a result of the teleconference.

You explained that Google views our response to Interrogatory No. 1 as deficient because the response does not identify a conception date. We explained that I/P Engine has no present contention regarding a conception date, and asked if Google would be satisfied with a statement that I/P Engine does not presently contend the conception date is prior to the December 3, 1998 filing date of the '420 patent. You confirmed that this would address Google's concerns regarding the present statement. While we believe our current response is sufficient, we will nonetheless update our response to Interrogatory No. 1 with the requested statement by Friday, June 1, 2012.

Regarding the deposition of Mr. Cook, you explained that Mr. Cook was unavailable the week of June 4, but could be available the week of July 9. You explained that you had not checked his availability prior to the scheduled Google 30(b)(6) depositions because you assumed we would want to take Mr. Cook's deposition after the Google 30(b)(6) deposition. We explained that our intention was to take Mr. Cook's deposition prior to the Google 30(b)(6) deposition. You said you would get back to us with Mr. Cook's availability prior to the week of July 9. If Mr. Cook is not available prior to July 9, please provide an explanation as to why Mr. Cook is unavailable prior to that date.

Regarding the number of depositions, we explained that it is our intention to take no more than 14 30(b)(1) depositions (one for each of the individuals identified on Defendants initial disclosures). We explained that we did not intend to limit our depositions to the individuals on the initial disclosures, but that we would take no more than 14 total 30(b)(1) depositions. So, for example, deposing Mr. Cook would mean that we would need to forego deposing at least one person on Defendants' list of initial disclosures. You said that you would confer with your clients regarding this proposal of 14 30(b)(1) depositions.

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You informed us that the Google video "Ads Tech Talk Series: SmartASS, 4/17/08" could be made available at the San Francisco offices of Quinn Emanuel, provided that we provide at least 24 hours notice of our availability to view the video, so that appropriate arrangements could be made. We will contact you to make further arrangements.

Regarding the list of people who report to the Google employees listed in Google's initial disclosures, and a list of the people to whom these employees report, you explained that these documents were with your e-discovery vendor and are set for production, but you could not provide a date certain of when those documents would be produced. You explained that your vendor could not process the documents until after it was finished with the processing of Google's May 30 custodial production. Please produce the requested documents by Friday, June 1, 2012.

Similarly, with respect to the expert reports and deposition transcripts of Dr. Stephen Becker, you explained that you are currently redacting these documents. Please produce the requested documents by June 1.

Regarding the exhibits accompanying the deposition and trial transcripts from the identified relevant AdWords litigations, you explained that the vast majority of these exhibits were with the vendor and are set for production, but you could not provide a date certain of when those documents would be produced. You explained that some of the exhibits were still being reviewed for redactions, and that some of the exhibits may contain source code that will need to be viewed in accordance with the protective order. Please provide an update by June 1.

Finally, we discussed outstanding issues with I/P Engine's noticed 30(b)(6) topics. I/P Engine confirmed that it is maintaining its request for designees on Liability Topic Nos. 14-17 to IAC, Target and Gannett; Liability Topic Nos. 15 and 17-19 to Google; Damages Topic Nos. 4, 6, and 10-11 to IAC, Target and Gannett; Damages Topic Nos. 1, 2, 7, 10, and 17-18 to Google. You said you would get back to us with a response on these issues. Please provide an update by June 1.

Regarding Damages Topic No. 9 to Target, Gannett, and IAC; Damages Topic No. 16 to Google, you reiterated your request for case law regarding the need for Defendants to provide information as to indemnification. We will respond by separate letter.

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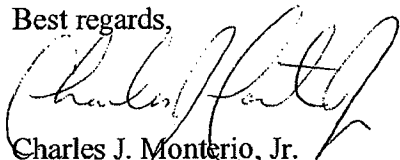
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Please notify us if your understanding of these issues is materially different. We await the produced documents or your update by June 1.

Best regards,



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CJM/

cc: Stephen E. Noona
David Bilsker
Kenneth W. Brothers
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