

EXHIBIT I

DICKSTEINSHAPIRO_{LLP}

1825 Eye Street NW | Washington, DC 20006-5403
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

June 5, 2012

Via E-mail

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

Re: Outstanding Google Discovery Obligations

Dear Jen:

I write in response to your May 31, 2012 letter regarding Defendants' deposition notice for Alexander Berger, Plaintiff's recent deposition count proposal, I/P Engine's deposition of Mr. Cook, and Google's outstanding discovery obligations.

With respect to Defendants' deposition notice for Alexander Berger, Mr. Berger is available for deposition on Wednesday, July 11 in New York, NY. Please confirm that you will go forward with his deposition on July 11.

With respect to Defendants' counter-proposal regarding deposition count, I/P Engine believes Defendants' proposal is unfair. I/P Engine, within reason and within the bounds of an agreed-upon deposition count, is entitled to notice and depose any fact witness it desires. Under Defendants' counter-proposal, however, I/P Engine will not be afforded those rights. For example, Google has imposed upon I/P Engine that Mr. Alferness' 30(b)(6) deposition will also be his individual deposition – therefore theoretically imposing upon I/P Engine the use of one of its three 30(b)(1) depositions. Google could likewise impose such conditions on all, or most, of its upcoming 30(b)(6) designees and therefore expend all of I/P Engine's 30(b)(1) depositions without I/P Engine ever choosing which fact witnesses it wants to notice and depose. I/P Engine will not agree to this proposal. In the interests of resolution, I/P Engine will consider a proposal where I/P Engine agrees to take from IAC, Gannett, Target and AOL an equivalent number of individual depositions as the number of witnesses listed in that Defendant's initial disclosures. Additionally, I/P Engine proposes taking from Google a total of 5 individual depositions provided that any 30(b)(6) depositions (such as that of Mr. Alferness) are excluded from the agreed-upon deposition count. Please let us know Defendants' position as to I/P Engine's proposal by June 7. If the parties are at an impasse, please let us know.

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Regarding Mr. Cook's deposition, we asked for an explanation of Mr. Cook's unavailability in the same way you asked us to explain the unavailability of the inventors. If I/P Engine's request "is counterproductive and inefficient" than Google admits its conduct as to the inventors' depositions was likewise counterproductive and inefficient. You are claiming that Mr. Cook does not have a single free day over a 3 week time period. We are simply requesting explanation as to why—again as you requested and we provided regarding the inventors' schedules.

Regarding the requested prior Google AdWords litigation documents, since I/P Engine's proposed date for production was not satisfactory to Google, please provide by June 7 a date by which I/P Engine can expect to receive these documents. I/P Engine needs these documents to adequately prepare for the upcoming, scheduled Google 30(b)(6) depositions, and is being prejudiced by the length of time that it is taking Google to produce the requested documents. I/P Engine reserves all rights.

With respect to the contention topics of I/P Engine's noticed 30(b)(6) depositions, I/P Engine acknowledges your statement that "Defendants will not be providing witnesses to testify as to the contention portions of Liability Topic Nos. 14-17 to IAC, Target, and Gannett; Liability Topic Nos. 17-19 to Google; Damages Topic Nos. 10-11 to IAC, Target, and Gannett; and Damages Topic Nos. 17-18 to Google at this time." I/P Engine reserves all rights going forward on this issue; however, before I/P Engine considers taking action to the Court, I/P Engine requests that Defendants clarify its statement by June 7 as to why they include the phrase "at this time."

Regarding Damages Topic No. 2 to Google, your letter states that you "do not believe it is reasonable, for all of the reasons outlined in Google's objections" to provide a witness to testify as to the percentage of total search advertising results for which AdWords and AdSense for Search, rather than other search advertising systems, were used by end users. Google's only objections to this portion of the 30(b)(6) notice were that the terms "total search advertising results," "end users" and "other search advertising systems" were vague and ambiguous, and that the phrase "percentage of total search advertising results for which Google AdWords and Google AdSense for Search . . . was used by end users" was unintelligible. Since then, however, the parties have discussed this topic on at least two occasions and based on those discussions it appears Google has a clear understanding what information I/P Engine is seeking. Thus, Google's objections have been addressed. Therefore, please explain Google's basis for concluding that this request/topic is "unreasonable." Google's objections do not clearly explain why Damages Topic No. 2 to Google is not an appropriate topic that is relevant to this litigation and will not lead to discovery of admissible evidence. Please let us know Google's final position by June 7. If the parties are at an impasse, please let us know.

DICKSTEINS HAPIRO_{LLP}

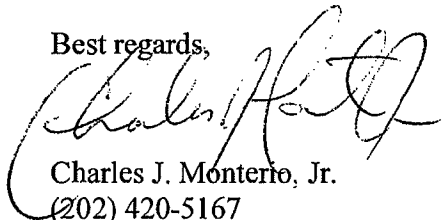
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With respect to the documents Google has requested be destroyed, I/P Engine confirms that it has destroyed the identified documents.

Best regards,



Charles J. Monterio, Jr.

(202) 420-5167

MonterioC@dicksteinshapiro.com

CJM/

cc: Stephen E. Noona
David Bilsker
Kenneth W. Brothers
Jeffrey K. Sherwood
Dawn Rudenko Albert