

# EXHIBIT F

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION**

I/P ENGINE, INC.,	)	
	)	
Plaintiff,	)	
v.	)	Civ. Action No. 2:11-cv-512
	)	
AOL, INC. et al.,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF I/P ENGINE, INC.’S  
FIRST LIABILITY RULE 30(b)(6) NOTICE OF DEPOSITION OF  
DEFENDANT IAC SEARCH AND MEDIA, INC.**

PLEASE TAKE NOTICE that Plaintiff I/P Engine, Inc. (“I/P Engine”), by and through its attorneys, will take the deposition upon oral examination of Defendant IAC Search and Media, Inc. (“IAC”) pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Local Rules of the Eastern District of Virginia. The deposition will take place at 9 AM on May 1, 2012 at the offices of Dickstein Shapiro LLP, 1825 Eye Street, NW, Washington, DC 20006, or such other time, day, and location as may be mutually agreed upon by counsel. The deposition will continue from day to day until completed, with such adjournments as to time and place as may be necessary. The deposition will be made before an officer authorized to administer an oath and will be recorded by stenographic and/or videographic means.

PLEASE TAKE FURTHER NOTICE that IAC shall designate, pursuant to Rule 30(b)(6), one or more officers, directors, managing agents, or employees (or other persons) who are competent, consent to testify on behalf of IAC, and have the best overall knowledge of all matters known or reasonably available to IAC of each of the following topics, and, for each person so designated, IAC shall set forth in a written response each of the subjects to which each

designee will testify. Pursuant to the Discovery Plan, IAC shall attempt in good faith to identify, for each person designated, the topics on which the witness is being offered to testify seven days in advance of the agreed-upon deposition date.

### **DEFINITIONS**

For purposes of this Notice, the following definitions apply:

A. “Defendant IAC Search and Media, Inc.” means the Defendant in this lawsuit, IAC Search and Media, Inc. and includes its respective predecessors, subsidiaries, divisions, parents or otherwise related entities and/or divisions thereof, and includes directors, officers, present and former employees, agents, representatives and attorneys of such entities and/or divisions thereof.

B. “I/P Engine” means the Plaintiff in this lawsuit, I/P Engine, Inc.

C. “Quality Score” means the “quality score” referenced in IPE 0000079.

D. “Landing Page” means the “landing page” referenced as “landing page” in IPE 0000079.

E. “Relevance” means the “Relevance score” referenced in IPE 0000079.

F. “Google AdWords” means Google’s advertising program that serves Search Ads (as referred to in IPE 0000079) and displays advertisements alongside Google’s query-based search results. Google AdWords is one of the accused products in the present litigation.

G. “Google AdSense for Search” means Google’s advertising program that allows third parties to monetize searches on their websites (as referred to in IPE 0000079) and allows websites to display advertisements alongside their query-based search results. Google AdSense for Search is one of the accused products in the present litigation.

H. “Click Through Rate” or “CTR” means the ratio of clicks to impressions for an ad or page as defined on G-IPE-0096925.

## TOPICS

1. IAC's decision to use Google AdSense for Search including, without limitation, any analysis of Google AdSense for Search performed by IAC and any comparison of Google AdSense for Search with any other comparable products performed by IAC.
2. Information provided by Google, and representations made by Google, regarding Google AdSense for Search prior to IAC's decision to use Google AdSense for Search including, without limitation, the technical operation of Google AdSense for Search and the advantages of Google AdSense for Search over competitors' products.
3. Information provided by Google, and representations made by Google, during IAC's use of Google AdSense for Search including, without limitation, any changes to the technical operation of Google AdSense for Search and the advantages of Google AdSense for Search over competitors' products.
4. IAC's knowledge regarding Google's marketing and promotion materials related to or referring to Quality Score.
5. The conception, development, testing, and use of IAC's system using Google AdSense for Search.
6. IAC's participation in any decisions related to its use of Google AdSense for Search.
7. The technical and functional changes or other differences, if any, between IAC's implementation of Google AdSense for Search and any other version of Google AdSense for Search.
8. IAC's awareness of the technical and functional differences, if any, between Google AdWords and Google AdSense for Search.
9. IAC's awareness of improvements, modifications or changes to Google AdWords and Google AdSense for Search since January 1, 2005.

10. IAC's knowledge, if any, of the conception, development, testing and use of Quality Score and each of its components (including Landing Page, CTR and Relevance) as Quality Score was sold, or offered for sale or used in the United States, as well as the use of Quality Score by or on behalf of IAC from January 1, 2005 to the present.

11. IAC's knowledge, if any, of the research, design and development efforts related to Google AdSense for Search including without limitation the use of Quality Score in Google AdSense for Search, including why the work was undertaken, the desired goals, the resources committed to the project, the forecast or expectations for Quality Score, and any analysis of Quality Score including, but not limited to, research, design and development efforts related to each component of Quality Score including Landing Page, CTR and Relevance.

12. IAC's knowledge, if any, of the system architecture and operational/functional descriptions of Google AdSense for Search including without limitation the use of Quality Score, e.g., how it is calculated, how it is represented, how it is used in the Google AdSense for Search system, and how it is discussed at Google including, but not limited to, the system architecture and operational/functional descriptions of each component of Quality Score including Landing Page, CTR and Relevance.

13. IAC's awareness of when Quality Score was first introduced into Google AdWords and Google AdSense for Search and how the use of Quality Score in Google AdWords and Google AdSense for Search has changed since the introduction of Quality Score.

14. The reasons, including all factual bases, for IAC's contention that it is not a direct infringer including, but not limited to, IAC's contention that IAC's systems "using Google's AdSense for Search system do not incorporate collaborative filtering."

15. Identification and technical explanation of any and all non-infringing alternatives on which IAC intends to rely upon to support a claim and defense.

16. The complete and full factual basis for IAC's assertion of paragraph 138 of its First Amended Answer asserting "IAC Search has not infringed, and is not infringing, any valid claim of the '420 patent or the '664 patent."

17. The complete and full factual basis for IAC's assertion of paragraph 139 of its First Amended Answer asserting "[t]he claims of the I/P Engine patents are invalid for failure to satisfy one or more conditions of patentability set forth in Title 35 of the United States Code, including, but not limited to, 35 U.S.C. §§ 101, 102, 103 and/or 112."

Dated: April 2, 2012

By: /s/ Charles J. Monterio, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of April, 2012, the foregoing **PLAINTIFF I/P ENGINE, INC.'S FIRST LIABILITY RULE 30(b)(6) NOTICE OF DEPOSITION OF DEFENDANT IAC SEARCH AND MEDIA, INC.**, was served via email, on the following:

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