EXHIBIT B

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 RESPONSES AND OBJECTIONS TO DEFENDANT IAC SEARCH & MEDIA, INC.'S FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, I/P Engine, Inc. ("I/P Engine") hereby responds and objects to IAC Search & Media Inc.'s ("IAC") First Set of Interrogatories ("Interrogatories"). These responses are based on information reasonably available to I/P Engine at the present time. I/P Engine reserves the right to supplement these responses when, and if, additional information becomes available. I/P Engine also reserves the right to object on any ground at any time to such other or supplemental Interrogatories IAC may propound involving or relating to the subject matter of these Interrogatories.

GENERAL OBJECTIONS

1. I/P Engine objects to the Interrogatories as overly broad and unduly burdensome to the extent that they purport to require I/P Engine to seek information or documents outside of I/P Engine's possession, custody, or control as such information is beyond the permissible scope of the Federal Rules of Civil Procedure and applicable law, and would further pose an undue burden on I/P Engine.

submits that its response to this Interrogatory may be derived from those disclosures and contentions. I/P Engine's contentions and the Expert Report of Ophir Frieder are based on the knowledge known at this time, and are subject to change based on ongoing discovery, additional evidence, and/or further investigation. I/P Engine and its expert Dr. Frieder reserve the right to amend and/or supplement the infringement contentions or the expert report if and when further information becomes available.

INTERROGATORY NO. 2:

If you contend that you are entitled to any monetary recovery as a result of alleged INFRINGEMENT of the PATENTS-IN-SUIT by IAC, state whether you contend that you are entitled to lost profits or a reasonable royalty, and state all facts, evidence, and reasons upon which you rely in support of your contention, such that if you contend you are entitled to an award of lost profits damages, you identify each of your products you allege falls within the scope of any claim of the PATENTS-IN-SUIT and state the total sales annually in units and dollars from its introduction to the present, and if you contend you are entitled to an award of reasonable royalty damages, state what you assert to be a reasonable royalty to be paid by IAC under 35 U.S.C. Section 284, including the complete factual bases on which you base your calculation of such royalty rate.

RESPONSE:

Plaintiff incorporates its general objections and specific objections. I/P Engine objects to this Interrogatory to the extent it seeks information that is protected by the attorney-client privilege, the work product doctrine, Rule 26(b)(4)(B) immunity, or any other applicable privilege or immunity. I/P Engine further objects to this Interrogatory as overly burdensome to the extent that it is duplicative of the expert opinion evidence served in this litigation, which has

been provided in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Court, or the Court's scheduling orders. Subject to and without waiving the foregoing objections, I/P Engine responds:

I/P Engine seeks compensatory damages, past and future, amounting to no less than reasonable royalties and prejudgment interest to compensate it for IAC's infringement. I/P Engine served the Expert Report of Dr. Stephen L. Becker, Ph.D. on July 25, 2012. I/P Engine hereby incorporates this disclosure by reference and submits that its response to this Interrogatory may be further derived from this disclosure. The Expert Report of Dr. Stephen L. Becker, Ph.D. is based on the knowledge known at this time, and is subject to change based on ongoing discovery, additional evidence, and/or further investigation. I/P Engine and its expert Dr. Becker reserve the right to amend and/or supplement the expert report if and when further information becomes available.

INTERROGATORY NO. 3:

In reference to IAC's affirmative defense of laches, state whether YOU contend that any delay by YOU or the PREDECESSORS-IN-INTEREST in asserting the PATENTS-IN-SUIT against IAC was reasonable or excusable, and for any such delay that YOU contend was reasonable or excusable, IDENTIFY the length of and all reasons or excuses for the delay, all facts that support any contention that this delay was reasonable or excusable, all DOCUMENTS that support any such contention, and all PERSONS with knowledge of the facts or the DOCUMENTS that support such contention.

RESPONSE:

Plaintiff incorporates its general objections and specific objections. I/P Engine objects to the premise of this Interrogatory, in that it assumes an unsupported legal conclusion, e.g., that