Exhibit 1

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 SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS TO DEFENDANT GOOGLE, INC.

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and Rule 26 of the Local Rules of the United States District Court for the Eastern District of Virginia, Plaintiff I/P Engine, Inc. ("I/P Engine") requests Defendant Google, Inc. ("Google") respond to the following requests, and produce the documents sought for inspection and copying at the offices of I/P Engine's counsel, Dickstein Shapiro LLP, 1825 Eye Street, N.W., Washington, D.C. 20006, or at a place mutually agreeable to the parties, pursuant to the Federal Rules of Civil Procedure, the Local Rules of the Court, the Judge's procedures, and the Stipulation entered into by the parties on November 4, 2011.

INSTRUCTIONS

1. These requests are continuing in character, so as to require Google (as defined below) to produce any further documents called for in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

2. All documents produced pursuant to these requests are to be produced in the form, order and manner in which they are maintained in Google's files or shall be organized and labeled to correspond with the categories in the requests.

3. If any documents identified in response to these requests are in the possession of a third party, state the identity and location of the third party.

4. Unless otherwise specified herein, each reference to a firm or company shall be deemed to refer to that firm or company, and its parents, subsidiaries, associated, affiliated, related or controlled companies.

5. As to each document produced, specify each and every request to which it responds.

6. Unless otherwise specified, Plaintiff seeks documents for the period January 1, 2002 to the present.

7. If the production of any document is objected to on the ground of privilege or work product, or for any other reason, with respect to each such document state: (1) the identity of its author(s) or creator(s); (2) the identity of its recipient(s); (3) its subject matter; (4) the identity of person(s) to whom the document, or any portion thereof, has already been revealed; (5) the source of the document; (6) the date of the document; (7) the number of pages in the document; and (8) the basis upon which it is being withheld, including sufficient facts from which the court and Opposer can assess and determine the validity of such assertion of privilege, work product, or other immunity.

8. The headings and italics explanations associated with each Request are included to only aid the reader, and should not be interpreted to limit the Request.

DEFINITIONS

A. "Defendant Google, Inc." means the Defendant in this lawsuit, Google, Inc. and 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. The "'420 Patent" means U.S. Patent No. 6,314,420.

D. The "'664 Patent" means U.S. Patent No. 6,775,664.

E. "Person" is defined as any natural person or any business, legal, or governmental entity or association.

F. "Director," "officer," "employee," "agent," and "representative" means any individual serving as such and any individual serving at any relevant time in such capacity, even though no longer serving in such capacity. Google's "representatives" refers to and includes Google's officers, directors, agents, employees, attorneys, and consultants.

G. "Date" means the exact day, month and year, if ascertainable, or, if not, the best approximation (including relationship to other events).

H. The terms "relating to" and "referring to" shall be interpreted so as to encompass the scope of discovery set forth in Rule 26(b) of the Federal Rules of Civil Procedure.

I. "Document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Rule 34 of the Federal Rules of Civil Procedure and Local Rule 26.1 of the Court. A draft, non-identical copy or version bearing any annotation or marking is a separate document within the meaning of this term.

J. "Describe" and/or "state" means to set forth fully and unambiguously every fact relevant to the subject of the Request, of which you (including your agents and representatives) have knowledge or information.

K. "Concerning" means referring to, describing, evidencing, or constituting.

L. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

M. Any word written in the singular herein shall be construed as plural or vice versa when necessary to facilitate the response to any Request.

N. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of the Request all responses which otherwise might be construed to be outside its scope.

O. "Other Defendant Technology" means any product, service, method, or system used by, or on behalf of, any other Defendant in this litigation including, but not limited to, AOL, Inc. and IAC Search & Media, Inc. to select search results for display on search results pages by considering how well search results match the user's search query and using data relating to other users' feedback to the search result.

P. "Search Technology incorporating User Feedback" means any product, service, method, or system used by, or on behalf of, Google to select search results for display on search results pages by considering how well search results match the user's search query and using data relating to other users' feedback to the search result (systems including, but not limited to, systems such as Google's organic search systems and search advertising systems). In regards to this definition, Plaintiff seeks documents directed to search systems utilizing a calculation, algorithm,

value or score that uses, in some way, user feedback to determine search results for presentation on a search results page in response to a user query.

Q. "Build" means a process (e.g., manual, automated or a combination of manual and automated) for creating deliverable software (e.g., executable files, libraries, object code, executable installation packages) from source code.

R. "Source Code Maintenance" means the process of designing the appropriate directory structure for the source code; determining which version control system(s) to use to manage the source code, configuring a version control system to manage the source code and providing support for the management of the source code (e.g., within the version control system).

S. "Publisher" means any past, current or potential member of the Google Network.

T. "Google Network" means Google's network of third party customers that use Google's advertisement systems to deliver relevant advertisements to their own websites.

U. "Relevance Score" means any variable, score, and/or value that is used to determine advertisement search results for presentation on a search results page in response to a user query, and derived from at least the factors of:

(1) the relevance of the content of the search results to the user search query including, but not limited to, the landing page or the advertisement text to the user search query, and

(2) data relating to users' responses to the search result including, but not limited to, an advertisement's Click Through Rate.

In regards to this definition, Plaintiff seeks documents directed to systems utilizing a calculation, algorithm, value or score that uses factors (1) and (2) above to determine advertisement search results for presentation on a search results page in response to a user query

(e.g., systems including, but not limited to, systems such as Google's AdWords system and Google's AdSense for Search system). *See e.g.*, IPE0000061.

V. "Click Through Rate" means the rate at which end users click a search result or advertisement search result, e.g., the number of clicks on a search result divided by the number of times the search result is shown (impressions), and is typically expressed as a percentage.

W. "Search Partner" means any past, current or potential company or entity that uses Google's organic search system to deliver relevant search results to their own websites.

DOCUMENT REQUESTS

DOCUMENT REQUEST NO. 1:
SYSTEM ARCHITECTURE REGARDING PRESENTATION OF ADVERTISEMENTS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the system architecture used by Google to present advertisements on search results pages in response to a user query.

In this Request, Plaintiff seeks documents sufficient to show the system architecture used to implement each Google system identified in response to Plaintiff's Interrogatory No. 2, and how that architecture operates from the receiving of a user's search query to the displaying of advertisements including, but not limited to, the architecture for receiving a search query, the architecture for processing the search query, the architecture for calculating a Relevance Score, the architecture for ranking advertisements, and the architecture for displaying the ranked advertisements.

DOCUMENT REQUEST NO. 2:
SYSTEM ARCHITECTURE REGARDING THE RECEIPT OF ADVERTISEMENTS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the system architecture used by Google to receive advertisements from advertisers.

In this Request, Plaintiff seeks documents sufficient to show the system architecture used to implement each Google system identified in response to Plaintiff's Interrogatory No. 2, and how that architecture operates from the receiving of an advertisement from an advertiser to the advertisement being ready for presentation including, but not limited to, the architecture for receiving an advertisement, the architecture for processing the advertisement, the architecture for indexing the advertisement, and the architecture for storing the advertisement.

DOCUMENT REQUEST NO. 3:
SYSTEM ARCHITECTURE REGARDING ADVERTISEMENT SELECTION AND PLACEMENT

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the system architecture used by Google to present advertisements on search results pages of a Publisher's website in response to a user query.

In this Request, Plaintiff seeks documents sufficient to show the system architecture used to implement each Google system identified in response to Plaintiff's Interrogatory No. 2, and how that architecture operates from the receiving of a user's search query from a Publisher's website to the displaying of advertisements on that Publisher's website including, but not limited to, the architecture for receiving a search query from a Publisher's website, the architecture for processing the search query, the architecture for calculating a Relevance Score, the architecture for ranking an advertisement, the architecture for sending the ranked advertisements to the

Publisher's website and the architecture for displaying the ranked advertisements on that Publisher's website.

DOCUMENT REQUEST NO. 4:
SYSTEM ARCHITECTURE REGARDING ORGANIC SEARCH RESULTS

For each Google system identified in response to Plaintiff's Interrogatory No. 1, documents sufficient to show the system architecture used by Google to present search results on search results pages in response to a user query.

In this Request, Plaintiff seeks documents sufficient to show the system architecture used to implement each Google system identified in response to Plaintiff's Interrogatory No. 1, and how that architecture operates from the receiving of a user's search query to the displaying of search results including, but not limited to, the architecture for receiving a search query, the architecture for processing the search query, the architecture for ranking a search result, and the architecture for displaying the ranked search result.

DOCUMENT REQUEST NO. 5:
SYSTEM ARCHITECTURE REGARDING SEARCH PARTNER WEBSITES

For each Google system identified in response to Plaintiff's Interrogatory No. 1, documents sufficient to show the system architecture used by Google to present search results on search results pages of a Search Partner's website in response to a user query.

In this Request, Plaintiff seeks documents sufficient to show the system architecture used to implement each Google system identified in response to Plaintiff's Interrogatory No. 1, and how that architecture operates from the receiving of a user's search query from a Search Partner's website to the displaying of search results on that Search Partner's website including, but not limited to, the architecture for receiving a search query from a Search Partner's website, the architecture for processing the search query, the architecture for ranking a search result, the

architecture for sending the ranked search results to the Search Partner's website and the architecture for displaying the ranked search results on that Search Partner's website.

DOCUMENT REQUEST NO. 6:
OPERATIONAL DESCRIPTION REGARDING PRESENTATION OF ADVERTISEMENTS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the function, operation and use of the identified systems to present advertisements on search results pages in response to a user query.

In this Request, Plaintiff seeks documents (for example, but not limited to, flowcharts or design specifications) sufficient to show how the identified systems operate from the receiving of a user's search query to the displaying of advertisements including, but not limited to, receiving a search query, processing the search query, calculating a Relevance Score, ranking advertisements, and displaying the ranked advertisements.

DOCUMENT REQUEST NO. 7:
OPERATIONAL DESCRIPTION REGARDING THE RECEIPT OF ADVERTISEMENTS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the function, operation and use of the identified systems to receive advertisements from advertisers.

In this Request, Plaintiff seeks documents (for example, but not limited to, flowcharts or design specifications) sufficient to show how the identified systems operate from receiving an advertisement from an advertiser to the advertisement being ready for presentation including, but not limited to, receiving an advertisement, processing the advertisement, indexing the advertisement, and for storing the advertisement.

DOCUMENT REQUEST NO. 8:
OPERATIONAL DESCRIPTION REGARDING ADVERTISEMENT SELECTION AND PLACEMENT

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the function, operation and use of the identified systems to present advertisements on search results pages of a Publisher's website in response to a user query.

In this Request, Plaintiff seeks documents (for example, but not limited to, flowcharts or design specifications) sufficient to show how the identified systems operate from the receiving of a user's search query from a Publisher's website to the displaying of advertisements on that Publisher's website including, but not limited to, receiving a search query from a Publisher's website, processing the search query, calculating a Relevance Score, ranking an advertisement, sending the ranked advertisements to the Publisher's website and displaying the ranked advertisements on that Publisher's website.

DOCUMENT REQUEST NO. 9:
OPERATIONAL DESCRIPTION REGARDING ORGANIC SEARCH RESULTS

For each Google system identified in response to Plaintiff's Interrogatory No. 1, documents sufficient to show the function, operation and use of the identified systems to present search results on search results pages in response to a user query.

In this Request, Plaintiff seeks documents (for example, but not limited to, flowcharts or design specifications) sufficient to show how the identified systems operate from the receiving of a user's search query to the displaying of search results including, but not limited to, receiving a search query, processing the search query, ranking a search result, and displaying the ranked search result.

DOCUMENT REQUEST NO. 10:
OPERATIONAL DESCRIPTION REGARDING SEARCH PARTNER WEBSITES

For each Google system identified in response to Plaintiff's Interrogatory No. 1, documents sufficient to show the function, operation and use of the identified systems to present search results on search results pages of a Search Partner's website in response to a user query.

In this Request, Plaintiff seeks documents (for example, but not limited to, flowcharts or design specifications) sufficient to show how the identified systems operate from the receiving of a user's search query from a Search Partner's website to the displaying of search results on that Search Partner's website including, but not limited to, receiving a search query from a Search Partner's website, processing the search query, ranking a search result, sending the ranked search results to the Search Partner's website and displaying the ranked search results on that Search Partner's website.

DOCUMENT REQUEST NO. 11:
SYSTEM ARCHITECTURE AND OPERATIONAL DESCRIPTION REGARDING GOOGLE WEBCRAWLER

Documents sufficient to show the system architecture of the Google Webcrawler, and the function, operation and use of the Google Webcrawler.

DOCUMENT REQUEST NO. 12:
DESCRIPTION OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to identify all of the factors used by Google to determine a Relevance Score including, but not limited to, the factors advertised as being used by Google to determine Google's "Quality Score" including, but not limited to, "the historical clickthrough rate (CTR) of the keyword and the matched ad on Google; if the ad is appearing on a search network page, its CTR on that search network partner is also considered[, y]our account history, which is measured by the CTR of all the

ads and keywords in your account[, t]he historical CTR of the display URLs in the ad group[, t]he relevance of the keyword to the ads in its ad group[, t]he relevance of the keyword and the matched ad to the search query[, y]our account's performance in the geographical region where the ad will be shown[, and o]ther relevance factors" (*see e.g.*, IPE0000061).

DOCUMENT REQUEST NO. 13:
DESCRIPTION OF GOOGLE SYSTEMS

Documents sufficient to show the products, services, methods, or systems that are used by Google in the calculation of a Relevance Score and/or that receive, access or use a value, score or ranking representing a calculated Relevance Score.

DOCUMENT REQUEST NO. 14:
CONCEPTION OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the conception of each identified system including, but not limited to, documents sufficient to show who conceived of the system, where they conceived of the system, and when they conceived of the system.

DOCUMENT REQUEST NO. 15:
DEVELOPMENT OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show any modifications or changes to the Relevance Score used by each identified system including, but not limited to, any analysis, reports, studies, summaries, commentaries or notes, and documents sufficient to show the reasons for each such modification or change.

DOCUMENT REQUEST NO. 16:
DEVELOPMENT OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show any commercial uses of any modifications or changes to the Relevance Score used by each identified system including, but not limited to, any analysis, reports, studies, summaries, commentaries or notes.

DOCUMENT REQUEST NO. 17:
DEVELOPMENT OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show Google's research, design, development, engineering, Source Code Maintenance, Build, manufacture, implementation, testing, quality control, and version control activities for each identified system.

DOCUMENT REQUEST NO. 18:
DEVELOPMENT OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the person and department, whether within Google or any third party, having the most knowledge of, and the person and department having supervisory responsibility for, Google's research, design, development, engineering, Source Code Maintenance, Build, manufacture, implementation, testing, quality control, preparation or approval of advertising, sales and promotional materials, sales, conception or invention, patent filing, patent prosecution, or patent licensing for each identified system.

In this Request, Plaintiff seeks documents such as organizational charts and phone lists sufficient to identify the person(s) with the most knowledge of, or who had supervisory responsibility for, the listed activities for each identified system.

DOCUMENT REQUEST NO. 19:
DEVELOPMENT OF GOOGLE SYSTEMS

All documents that refer to or relate to any Other Defendant Technology including, but not limited to, comparisons between each Google system identified in response to Plaintiff's Interrogatory Nos. 1 or 2 and any Other Defendant Technology, and any evaluations, test results, analysis, reports, summaries, notes or recommendations of such systems.

DOCUMENT REQUEST NO. 20:
DEVELOPMENT OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2 that incorporates technology relating to a Relevance Score that was acquired from a third party, documents sufficient to identify the acquired technology, the party from which it was acquired, and the reasons why Google decided to acquire and incorporate the technology.

DOCUMENT REQUEST NO. 21:
DEVELOPMENT OF GOOGLE SYSTEMS

All documents that refer to or relate to Google's decision to develop and commercially introduce a paid search advertising system (e.g., systems including, but not limited to, cost per click advertising systems and cost per impression advertising systems) including, but not limited to, documents that refer to or relate to internal testing or analysis identifying the advantages or disadvantages of developing and commercially introducing a paid search advertising system.

DOCUMENT REQUEST NO. 22:
DEVELOPMENT OF GOOGLE SYSTEMS

All documents that refer to or relate to Google's decision to incorporate Click Through Rate into its paid search advertising system including, but not limited to, documents that refer to or

relate to internal testing or analysis identifying the advantages or disadvantages of incorporating Click Through Rate into a paid search advertising system.

DOCUMENT REQUEST NO. 23:
DEVELOPMENT OF GOOGLE SYSTEMS

All documents that refer to or relate to Google's decision to incorporate a Relevance Score into its paid search advertising system incorporating Click Through Rate including, but not limited to, documents that refer to or relate to internal testing or analysis identifying the advantages or disadvantages of incorporating a Relevance Score into a paid search advertising system.

DOCUMENT REQUEST NO. 24:
DEVELOPMENT OF GOOGLE SYSTEMS

Documents sufficient to show the testing of, analysis of, review of, and decisions made regarding the development and/or incorporation of a Relevance Score into each Google system identified in response to Plaintiff's Interrogatory No. 2 including, but not limited to, comparisons, evaluations, test results, analysis, reports, summaries, and recommendations.

DOCUMENT REQUEST NO. 25:
DEVELOPMENT OF GOOGLE SYSTEMS

Documents sufficient to show the problems, shortcomings, limitations, desired or advantageous features, or functionality relating to the operation, use or marketability of Relevance Score in each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 26:
MARKETING OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, all instructions for use, manuals, guides, website materials, training materials, presentations, or other

documents provided to Google employees, agents, contractors, or other third parties relating to the testing, installation, operation, use, repair or maintenance of the identified systems.

DOCUMENT REQUEST NO. 27:
MARKETING OF GOOGLE SYSTEMS

All Google advertisements, sales aids, promotion or marketing materials, or press releases that use the word "Quality Score."

DOCUMENT REQUEST NO. 28:
MARKETING OF GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the sales, marketing, or promotional materials that depict or describe the function and operation of the identified systems including, but not limited to, promotional literature, brochures, order forms, advertisements, awards, specification sheets, and website materials, whether or not such documents or materials are intended to be distributed to any Publisher or the public. *See e.g.*, IPE0000004-5; IPE0000028; IPE0000036-38; IPE0000043-45.

DOCUMENT REQUEST NO. 29:
USERS OF GOOGLE SYSTEMS

Documents sufficient to identify on a periodic basis (e.g., quarterly or yearly) any Publisher using each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 30:
USERS OF GOOGLE SYSTEMS

Documents sufficient to identify on a periodic basis (e.g., quarterly or yearly) any Search Partner using each Google system identified in response to Plaintiff's Interrogatory No. 1.

DOCUMENT REQUEST NO. 31:
ASSESSMENT OF GOOGLE SYSTEMS

Documents sufficient to show the manner in which Google determines, analyzes, or assesses the quality of its organic search results and the conclusions drawn by Google from such determinations, analyses, and assessments.

DOCUMENT REQUEST NO. 32:
ASSESSMENT OF GOOGLE SYSTEMS

Documents sufficient to show the manner in which Google determines, analyzes, or assesses the quality of its advertisement search results and the conclusions drawn by Google from such determinations, analyses, and assessments.

DOCUMENT REQUEST NO. 33:
GOOGLE SYSTEM-RELATED AGREEMENTS

All final assignment, license, revenue sharing and cost sharing agreements between Google and any other person or company relating to the use of each Google system identified in response to Plaintiff's Interrogatory No. 2 including, but not limited to, third parties such as Publishers.

In this Request, to the extent that Google uses a standard or form agreement or template in connection with any such assignment, license, revenue sharing or cost sharing agreement, Plaintiff seeks a representative agreement for each along with documents sufficient to identify all persons and companies (e.g., third parties including Publishers) that have executed the agreement.

DOCUMENT REQUEST NO. 34:
PUBLIC DOCUMENTS REGARDING GOOGLE SYSTEMS

All annual reports, proxy statements, reports or messages to shareholders, or other submissions to the U.S. Securities and Exchange Commission, or equivalent foreign regulatory

agency, discussing, concerning or relating to Google's systems identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 35:
GOOGLE'S REVENUES AND PROFITS: CLICK-THROUGH RATE

Documents sufficient to show Google's revenue, related expenses and resulting profits prior to and after it incorporated Click Through Rate into its paid search advertising system including, but not limited to, documents that refer to or relate to any increases in revenue after incorporating Click Through Rate into a paid search advertising system.

DOCUMENT REQUEST NO. 36:
GOOGLE'S REVENUES AND PROFITS: RELEVANCE SCORE

Documents sufficient to show Google's revenue, related expenses and resulting profits prior to and after it incorporated a Relevance Score into its paid search advertising system including, but not limited to, documents that refer to or relate to any increases in revenue after incorporating a Relevance Score into a paid search advertising system.

DOCUMENT REQUEST NO. 37:
GOOGLE SYSTEM SEARCH STATISTICS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show periodic (e.g., quarterly or yearly) search statistics including, but not limited to, statistics related to the number of user search queries, number of users, the average number of user search queries per user, the average number of advertisement search results per query search result, and the percentage of user search queries for which advertisement search results are displayed.

DOCUMENT REQUEST NO. 38:
GOOGLE'S REVENUE PER SEARCH

Documents sufficient to show how Google determines its revenue per search including, but not limited to, factors such as the percentage of query search results with advertisements, the number of advertisements displayed with such results, the click through rate, and the bid amount and actual cost per click amount, the weighting of such factors, and the calculations used in the determination of revenue per search.

DOCUMENT REQUEST NO. 39:
RELATIONSHIP OF GOOGLE'S ORGANIC SEARCH RESULTS

Documents sufficient to show the relationships between the quality of Google's organic search results and (i) the number of end user search queries received, (ii) the number of end users, (iii) Google's revenue per search, (iv) the percentage of search results with advertisements, (v) the number of advertisements responsive to such search results, (vi) the click through rate, (vii) the bid amount and actual cost per click amount, and (viii) Google's revenue.

DOCUMENT REQUEST NO. 40:
RELATIONSHIP OF GOOGLE'S ADVERTISING SEARCH RESULTS

Documents sufficient to show the relationships between the quality of Google's advertisement search results and (i) the number of end user search queries received, (ii) the number of end users, (iii) Google's revenue per search, (iv) the percentage of search results with advertisements, (v) the number of advertisements responsive to such search results, (vi) the click through rate, (vii) the bid amount and actual cost per click amount, and (viii) Google's revenue.

DOCUMENT REQUEST NO. 41:
FIRST SALE OR USE OF EACH GOOGLE SYSTEM

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the first sale, offer for sale, or use, of any prototype, product, system, or method that incorporates each identified system including, but not limited to, documents sufficient to show the date of each first sale, offer for sale, or use, and the function, operation and key components of each such prototype, product, system, or method sold, offered for sale, or used.

DOCUMENT REQUEST NO. 42:
SALES AND PROFIT FORECASTS FOR GOOGLE SYSTEMS

Regular periodic (e.g., quarterly or yearly) sales forecasts, market forecasts, profit or revenue forecasts, or sales projections for each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 43:
PRICING DOCUMENTS FOR GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, all price lists and all documents referring to or relating to prices, pricing strategies, evaluations of competitors' prices or consideration of what prices to charge for the services of products, systems, methods or services that use the identified systems including, but not limited to, documents sufficient to show the pricing of products, systems, methods and services incorporating such systems communicated between Google and any Publisher or other third party.

DOCUMENT REQUEST NO. 44:
PROFIT AND LOSS STATEMENTS FOR GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show periodic (e.g., quarterly or yearly) costs, revenues, profits, and losses for each identified system.

DOCUMENT REQUEST NO. 45:
SOURCES OF GOOGLE'S REVENUES FOR GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show the source of revenue generated, and how the revenue is generated from products, systems, and methods using each identified system.

DOCUMENT REQUEST NO. 46:
GOOGLE PAYMENTS FOR IP RIGHTS FOR GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show on a periodic basis (e.g., quarterly or yearly) compensation paid to Google, or by Google to its Publishers, for rights to, access to, or use of any products, systems, and methods using each identified system.

DOCUMENT REQUEST NO. 47:
PAYMENTS BETWEEN GOOGLE TO OTHER DEFENDANTS REGARDING GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show on an individual and periodic basis (e.g., quarterly or yearly) compensation paid to Google by Defendants AOL, Inc., IAC Search & Media, Inc., Gannett Company, Inc. and Target Corporation respectively, or by Google to Defendants AOL, Inc., IAC Search & Media, Inc., Gannett Company, Inc. and Target Corporation respectively, for rights to, access to, or use of any products, systems, and methods using each identified system.

DOCUMENT REQUEST NO. 48:
GOOGLE'S CAPITAL EXPENDITURES FOR GOOGLE SYSTEMS

For each Google system identified in response to Plaintiff's Interrogatory No. 2, documents sufficient to show Google's quarterly or yearly summaries of its capital expenditures for the identified systems.

DOCUMENT REQUEST NO. 49:
IDENTIFICATION OF OTHER LITIGATION REGARDING GOOGLE SYSTEMS

Documents sufficient to identify every litigation or other legal proceeding including arbitrations involving any component of Google's systems identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 50:
KEY DOCUMENTS FROM OTHER LITIGATION REGARDING GOOGLE SYSTEMS

All expert reports, contentions, claim construction-related documents, discovery responses, deposition transcripts, or trial transcripts that were generated in conjunction with in any litigation or other legal proceeding including arbitrations involving any component of Google's systems identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 51:
SECONDARY CONSIDERATIONS: COMMERCIAL SUCCESS

Documents sufficient to show the commercial success (or lack thereof) of each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 52:
SECONDARY CONSIDERATIONS: LONG-FELT NEED

Documents sufficient to show the long felt need of each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 53:
SECONDARY CONSIDERATIONS: PRIOR FAILURES

All documents referring to or relating to the failure of others to develop a system similar to each Google system identified in response to Plaintiff's Interrogatory No. 2 including, but not limited to, Google's failures during development.

DOCUMENT REQUEST NO. 54:
SECONDARY CONSIDERATIONS: SKEPTICISM

All documents referring to or relating to any skepticism by experts of each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 55:
SECONDARY CONSIDERATIONS: PRAISE

All documents referring to or relating to any praise by others of each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 56:
SECONDARY CONSIDERATIONS: MARKET ACCEPTANCE

All documents referring to or relating to any problems, limitations, desired additional features, marketplace acceptance, operational needs or marketplace needs for each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 57:
SECONDARY CONSIDERATIONS: COPYING

All documents referring to or relating to the copying of Google's systems identified in response to Plaintiff's Interrogatory No. 2 by competitors.

DOCUMENT REQUEST NO. 58:
GOOGLE'S LICENSING POLICIES AND PRACTICES

Documents sufficient to show Google's policies or practices regarding the seeking, granting, withholding, or negotiating of licenses.

DOCUMENT REQUEST NO. 59:
LICENSE, SETTLEMENT, OR INSURANCE AGREEMENTS

All final license, settlement, or insurance agreements between Google and any other person or company relating to any component of each Google system identified in response to Plaintiff's Interrogatory No. 2 including, but not limited to, assignments, licenses, and covenants not to sue.

DOCUMENT REQUEST NO. 60:
INDEMNIFICATION AGREEMENTS

All final indemnification agreements between Google and any other person or company relating to any component of each Google system identified in response to Plaintiff's Interrogatory No. 2.

DOCUMENT REQUEST NO. 61:
ASSERTED PATENT-RELATED DOCUMENTS

Each document that refers to or relates to the '420 or '664 patents.

DOCUMENT REQUEST NO. 62:
PRIOR INVENTORS OF ASSERTED PATENTS

All documents referring to or relating to any allegation by Google that any person, other than the named inventors of the '420 or '664 patents, is a prior inventor of any of the inventions claimed in the '420 or '664 patents.

DOCUMENT REQUEST NO. 63:
NAMED INVENTORS OF ASSERTED PATENTS

All documents referring to or relating to the named inventors of the '420 or '664 patents.

DOCUMENT REQUEST NO. 64:
NON-INFRINGEMENT, INVALIDITY, OR UNENFORCEABILITY OF ASSERTED PATENTS

Each document that refers to or relates to any non-infringement, invalidity, or unenforceability review, study, consideration or analysis of the ‘420 or ‘664 patents.

DOCUMENT REQUEST NO. 65:
POTENTIAL DESIGN AROUNDS

All documents referring to or relating to potential design arounds, or methods of modifying each Google system identified in response to Plaintiff’s Interrogatory No. 2 (e.g., actual or experimental systems not incorporating Click Through Rate or a Relevance Score).

DOCUMENT REQUEST NO. 66:
POTENTIAL DESIGN AROUNDS

All documents referring to or relating to potential design arounds, or methods of modifying each Google system identified in response to Plaintiff’s Interrogatory No. 1 (e.g., actual or experimental systems not incorporating Click Through Rate).

DOCUMENT REQUEST NO. 67:
NON-INFRINGEMENT CONTENTIONS

Each document that refers to or relates to Google’s contention that it does not directly infringe any of the claims of the ‘420 and ‘664 Patents either literally or under the doctrine of equivalents including, but not limited to, each document that refers to or relates to Google’s contention that each Google system identified in response to Plaintiff’s Interrogatory No. 2 does not infringe any claim of the ‘420 and ‘664 Patents.

DOCUMENT REQUEST NO. 68:
INDIRECT INDUCEMENT NON-INFRINGEMENT CONTENTIONS

Each document that refers to or relates to Google's contention that it is not liable for indirect infringement by inducement of infringement.

DOCUMENT REQUEST NO. 69:
INDIRECT CONTRIBUTORY NON-INFRINGEMENT CONTENTIONS

Each document that refers to or relates to Google's contention that it is not liable for indirect infringement by contributory infringement.

DOCUMENT REQUEST NO. 70:
INVALIDITY CONTENTIONS

Each document that refers to or relates to Google's contention that the claims of the '420 and '664 Patents are invalid.

DOCUMENT REQUEST NO. 71:
WILLFULNESS CONTENTIONS

Each document that refers to or relates to Google's contention that if it is found liable for infringement of any claim of the '420 or '664 patent, Google's infringement is not willful.

DOCUMENT REQUEST NO. 72:
NON-INFRINGING ALTERNATIVE CONTENTIONS

Each document on which Google intends to rely upon in this litigation related to a non-infringing alternative.

DOCUMENT REQUEST NO. 73:
PRIOR ART DOCUMENTS

All prior art on which Google may rely to support any claim or defense in this litigation.

DOCUMENT REQUEST NO. 74:
DOCUMENTS REFERENCED WHEN ANSWERING INTERROGATORIES

All documents relied upon in answering any of Plaintiff's Interrogatories.

DOCUMENT REQUEST NO. 75:
DEFENSE OR AFFIRMATIVE DEFENSE DOCUMENTS

All documents on which Google intends to rely upon to support any claim or defense in this litigation.

Dated: November 7, 2011

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

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 2011, the foregoing Plaintiff I/P Engine, Inc.'s First Set of Requests for the Production of Documents to Defendant Google, Inc., was served via email, on the following:

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