# **EXHIBIT F**

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

I/P ENGINE, INC.,

No. 2:11-cv-00512-RAJ-FBS

Plaintiff,

v.

AOL, INC., GOOGLE INC., IAC SEARCH & MEDIA, INC., GANNETT COMPANY, INC., and TARGET CORPORATION,

Defendants.

### EXHIBIT A

## <u>DEFENDANTS GOOGLE INC., AOL, INC., IAC SEARCH & MEDIA, INC., GANNET CO., INC., AND TARGET CORPORATION'S RULE 26(a)(3) WITNESS LIST</u>

Defendants Google Inc., AOL, Inc., IAC Search & Media, Inc., Gannett Co., Inc., and Target Corporation hereby provide their witness list pursuant to Fed. R. Civ. P. 26(a)(3) and the Rule 16(b) Scheduling Order. Defendants identify the name and, if not previously provided, the address and telephone number of each witness they may present at trial other than solely for impeachment — separately identifying those the parties expect to present and those they may call if the need arises.

#### A. Witnesses Defendants Will Present At Trial

- Jonathan Alferness. Mr. Alferness is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 2. <u>Bartholomew Furrow.</u> Mr. Furrow is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.

- 3. <u>Dr. Lyle Ungar.</u> Dr. Ungar is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 4. <u>Dr. Keith Ugone.</u> Dr. Ugone is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 5. <u>Gary Culliss.</u> Mr. Culliss is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 6. <u>Ruben Ortega.</u> Mr. Ortega is available via his counsel, Theo Angelis, K&L Gates LLP, 925 4<sup>th</sup> Avenue, Suite 2900, Seattle, WA 98104, (206) 370-8101.

#### **B.** Witnesses Defendants May Present At Trial If the Need Arises

- 1. <u>Andrew K. Lang.</u> Defendants believe Mr. Lang can be contacted through Plaintiff's counsel.
- 2. <u>Donald M. Kosak</u>. Defendants believe Mr. Kosak can be contacted through Plaintiff's counsel.
- 3. <u>Alexander Berger.</u> Defendants believe Mr. Kosak can be contacted through Plaintiff's counsel.
- 4. <u>Andrew Perlman</u>. Defendants believe Mr. Perlman can be contacted through Plaintiff's counsel.
- 5. <u>Mark Blais</u>. Defendants believe Mr. Blais can be contacted at Lycos Inc., 100 Fifth Avenue, Waltham, Massachusetts 02451, (781)370-2651.
- 6. <u>Daniel Rose</u>. Defendants believe Mr. Rose can be contacted at rose@ordinology.com or (650) 331-2670.

- 7. <u>Nick Fox</u>. Mr. Fox is available via counsel for Defendants, Quinn Emanuel
  Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 8. <u>Derek Cook.</u> Mr. Cook is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 9. <u>Sanjay Datta.</u> Mr. Datta is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 10. <u>Gary Holt.</u> Mr. Holt is available via counsel for Defendants, Quinn Emanuel
   Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- James Maccoun. Mr. Maccoun is available via counsel for Defendants, Quinn
   Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415)
   875-6600.
- 12. <u>Stephen Kurtz</u>. Mr. Kurtz is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 13. <u>Celia Denery</u>. Ms. Denery is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 14. <u>Kevin Cotter</u>. Mr. Cotter is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 15. <u>James Christopherson</u>. Mr. Christopherson is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.

- 16. <u>Marie Bamford</u>. Ms. Bamford is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.
- 17. <u>Robert Hickernell</u>. Mr. Hickernell is available via counsel for Defendants, Quinn Emanuel Urquhart & Sullivan, 50 California Street, 22<sup>nd</sup> Floor, San Francisco, California, (415) 875-6600.

Defendants Google Inc., AOL, Inc., IAC Search & Media, Inc., Gannett Co., Inc., and Target Corporation reserve the right to call any witnesses identified or called by Plaintiff at trial. Defendants Google Inc., AOL, Inc., IAC Search & Media, Inc., Gannett Co., Inc., and Target Corporation also reserve the right to and may offer the video deposition testimony of any and/or all witnesses called by Plaintiff at trial for purposes of impeachment, including but not limited to offering or otherwise using any exhibit(s) referenced in such video deposition. This includes any witnesses called by Plaintiff at trial as live witnesses, as video-designated witnesses, or any other type of offer of testimony at trial.