

# Exhibit 9

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

I/P ENGINE, INC.,

Plaintiff,

v.

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

Defendants.

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

Jury Trial Demanded

**DEFENDANT GOOGLE INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF I/P  
ENGINE, INC.'S FOURTH SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Google Inc. hereby objects and responds in writing to I/P Engine, Inc.'s Fourth Set of Interrogatories as served on June 14, 2012.

**GENERAL OBJECTIONS**

Google makes the following general objections to each and every definition, instruction, and interrogatory made in I/P Engine's Fourth Set of Interrogatories to Google. Each of these objections is incorporated into the Specific Objections set forth below, whether or not separately set forth therein. By responding to any of the interrogatories or failing to specifically refer to or specify any particular General Objection in response to a particular interrogatory, Google does not waive any of these General Objections, nor admit or concede the appropriateness of any purported interrogatory or any assumptions contained therein.

1. Nothing in these responses should be construed as waiving rights or objections that might otherwise be available to Google nor should Google's responses to any of these

## **SPECIFIC OBJECTIONS AND RESPONSES**

### **INTERROGATORY NO. 15:**

For Google's U.S. Based Properties, from January 1, 2002 to the present, provide a chart identifying (in U.S. dollars) actual gross and net profits and losses and Google's costs on a monthly or quarterly basis, associated with the Accused Products, identifying all documents and other evidence Google will rely upon to support its response and each person who will testify as a witness at trial in support of Google's contention.

### **RESPONSE TO INTERROGATORY NO. 15:**

Google incorporates here its General Objections above by this reference. Google objects to this interrogatory on the grounds that: (i) it is overbroad and unduly burdensome; (ii) it is vague and ambiguous with respect to the phrases "Google's U.S. Based Properties" and "associated with the Accused Products"; (iii) it seeks information that is irrelevant, immaterial or not reasonably calculated to the discovery of admissible evidence; (iv) it is premature including because Plaintiff has disclosed no theory of damages; (v) is not limited to a relevant scope of time; and (vi) is duplicative of other discovery requests previously served. Google further objects to this interrogatory to the extent it seeks discovery of information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest or joint defense privilege, or other privilege or immunity. Google further objects to this interrogatory to the extent that it seeks proprietary, trade secret or other confidential or competitively sensitive business information.

Subject to the foregoing general and specific objections, Google responds that in accordance with Federal Rule of Civil Procedure 33(d), Google identifies the following

documents: G-IPE-0218431-48, G-IPE-0218778-81, G-IPE-0867397, G-IPE-0867398, G-IPE-0867399, G-IPE-0867400, and G-IPE-0867401-403.

Google reserves its right to supplement, revise or render more specific its responses to Interrogatory No. 15, including during expert discovery.

**INTERROGATORY NO. 16:**

For Google's U.S. Based Properties, from January 1, 2002 to the present, provide a chart identifying (in U.S. dollars) operating profit margin, incremental profit margin, actual and anticipated profit margins on a monthly or quarterly basis, associated with the Accused Products, identifying all documents and other evidence Google will rely upon to support its response and each person who will testify as a witness at trial in support of Google's contention.

**RESPONSE TO INTERROGATORY NO. 16:**

Google incorporates here its General Objections above by this reference. Google objects to this interrogatory on the grounds that: (i) it is overbroad and unduly burdensome; (ii) it is vague and ambiguous with respect to the phrases "Google's U.S. Based Properties," "incremental profit margin," "anticipated profit margins" and "associated with the Accused Products"; (iii) it seeks information that is irrelevant, immaterial or not reasonably calculated to the discovery of admissible evidence; (iv) it is premature including because Plaintiff has disclosed no theory of damages; (v) is not limited to a relevant scope of time; and (vi) is duplicative of other discovery requests previously served. Google further objects to this interrogatory to the extent it seeks discovery of information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest or joint defense privilege, or other privilege or immunity. Google further objects to this interrogatory to the