

EXHIBIT G

May 8, 2012

Charles Monterio
MonterioC@dicksteinshapiro.com

Confidential- Outside Counsel Only

Re: I/P Engine, Inc. v. AOL, Inc. et al.

Dear Charles:

I write to follow up on the issues discussed during our April 26 meet and confer telephone call, my April 27 letter, and your May 7 letter.

Deposition Dates

As you know, we have provided you with proposed dates for IAC's witnesses. We had also provided you a date for Mr. Alferness, Google's witness on many of the liability and damages topics. You indicated that you wished to take Google's deposition after the other defendants, and did not get back to us until May 7 about Mr. Alferness' deposition on May 23, and even then did not confirm the date. Mr. Alferness is no longer available on May 23. He is available June 14 to testify as to the topics set forth in my April 23 email. Please let us know promptly if that date works for Plaintiff.

Google is willing to provide a witness on May 31 to testify in response to Damages Topic Nos. 2 and 3, consistent with its objections and response served on April 18. Please confirm promptly that you will go forward with the deposition on May 31. If you want to take this deposition after the depositions of the other defendants, we will look for later dates, assuming availability of the witness. Google is willing to provide a witness on June 19 who will be designated to testify in

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100
NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100
SILICON VALLEY | 555 Twin Dolphin Drive, 5th Floor, Redwood Shores, California 94065-2139 | TEL (650) 801-5000 FAX (650) 801-5100
CHICAGO | 500 W Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401
WASHINGTON, DC | 1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004-2400 | TEL (202) 538-8000 FAX (202) 538-8100
LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100
TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712
MANNHEIM | Mollstraße 42, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100
MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

response to Damages Topic Nos. 13-15.

Gannett is willing to produce two witnesses, one on June 14 and one on June 15, in Quinn Emanuel's Washington, DC offices. One witness will testify as to Liability Topic Nos. 1-8 and 10-13, while another will testify about Damages Topic Nos. 1-3. As we have repeatedly pointed out, Gannett lacks knowledge as to many of these topics.

We will continue to work with our clients to provide dates for the other witnesses. Please confirm as soon as possible whether I/P Engine intends to go forward with depositions of IAC, Gannett, and Google on the dates we proposed.

ESI Agreement

You state that you [REDACTED]

[REDACTED] After discussing the issue with Google, we agree that Google will process, search and review all unsent emails [REDACTED]

[REDACTED] Google reserves all rights under the Protective Order regarding the inadvertent production of privileged information, including the right to claw back all documents containing such information. Google continues to question the usefulness of these emails, given that neither Google nor Plaintiff will [REDACTED]

Deposition Topics

Liability Topic No. 9 to Target, Gannett, and IAC and Liability Topic No. 11 to Google: You agreed during our April 26 meet-and-confer call to narrow the scope of these topics. In your May 7 letter, you stated that Plaintiff "is interested in these parties' knowledge of the improvements, modifications or changes related to the accused systems and functionalities of Google AdWords and Google AdSense for Search, and system features described in any asserted contention by any party related to infringement, non-infringement, or any other issue asserted in this litigation since January 1, 2005." While narrower than the original language, this is still too broad and vague to put Defendants on notice as to what is sought. In addition, Target, Gannett, and IAC are unlikely to have knowledge of these matters. Nevertheless Defendants will produce witnesses to testify as to their knowledge of the revised topic, as they understand it and to the extent they have knowledge. Google designates Mr. Alferness for this topic. IAC and Gannett designate their respective "Liability" witnesses.

Liability Topic Nos. 14-17 to IAC, Target and Gannett; Liability Topic Nos. 17-19 to Google; Damages Topic Nos. 10-11 to IAC, Target and Gannett; Damages Topic Nos. 17-18: We have explained that these questions are appropriate for contention interrogatories, not for 30(b)(6) witnesses, and that they are premature given that the Court has not yet issued its

Markman order. We are currently reviewing the case law cited in your May 7 letter, and will respond separately.

Liability Topic No. 15 and Damages Topic Nos. 4 and 6 to IAC, Target, and Gannett, and Liability Topic No. 15 and Damages Topic Nos. 1, 2, 7, and 10 to Google: These topics, which focus on non-infringing alternatives or design-arounds, are premature given that no *Markman* order has issued. Defendants are willing to produce a witness in response to topics regarding non-infringing alternatives and design-arounds after the Court issues its *Markman* order.¹

Damages Topic No. 5 to IAC, Target, and Gannett; Damages Topic No. 8 to Google: In your May 7 letter, you narrowed the scope of these topics. Defendants will provide witnesses to testify generally to these topics as revised in your May 7 letter. IAC and Gannett designate their respective “Damages” witnesses. Google designates Mr. Alferness in response to this topic.

Damages Topic No. 6 to IAC, Target, and Gannett; Damages Topic No. 10 to Google: During our meet-and-confer call, you narrowed the scope of these topics to information regarding “comparisons and evaluations directed to the differences between the average revenue per search, gross and net revenue, ad search results quality, and conversion rates of Google AdWords and Google AdSense for Search, and of the non-infringing alternatives.” Google will provide a witness to testify generally as to the comparisons and evaluations directed to the differences between revenue per search, revenue, and conversion rate for the two systems, to the extent this information exists. Google will also provide a witness to testify generally about whether, and if so, how, Google compares ad search results quality in the systems, to the extent Google understands how Plaintiff is using that term. Although non-Google Defendants are unlikely to have knowledge of this topic, Target, Gannett, and IAC will each provide a witness. Should the defendant not have any knowledge, we will inform you in advance. IAC and Gannett designate their “Damages” witnesses.

Damages Topic No. 7 to IAC, Target, and Gannett: During our meet-and-confer call, you clarified that this topic seeks any knowledge the non-Google Defendants might have about license agreements related to AdWords or AdSense for Search, including Google’s licensing policies and strategies for these products, based on their dealings with Google. As we have explained, we do not believe that IAC, Target, or Gannett have such knowledge. Nonetheless, these defendants will provide a witness as to this topic. IAC and Gannett designate their respective “Liability” witnesses.

Damages Topic No. 8 to IAC, Target, and Gannett: This topic seeks information about agreements relating to search advertising patents to which these Defendants are parties. You have explained that the purpose of this is to review comparable licenses for damages purposes.

¹ Please note that Defendants maintain their objection that Liability Topic No. 15 is a contention topic.

We do not believe that this is a sufficient basis for seeking such information. However, as a compromise, IAC, Target, and Gannett will provide a witness to testify about any license agreement the specific defendant produces in this case. IAC and Gannett designate their respective "Liability" witnesses.

Damages Topic No. 9 to Target, Gannett, and IAC; Damages Topic No. 16 to Google: We requested that you provide case law to support your position that Defendants are required to provide information as to indemnification, but your May 7 letter did not cite any case law on this topic. We continue to await this case law.

Liability Topic Nos. 5 and 8 to Google: These topics seek, among other things, information [REDACTED] we have previously agreed to produce a witness to testify generally about the system architecture of SmartAds. During the course of our discussion, you clarified that [REDACTED]

[REDACTED] Google will attempt to provide a witness in response to the appropriately narrowed topics. However, please be aware that, due to the passage of time, Google may no longer have extensive knowledge regarding [REDACTED]. To answer the question in your May 7 letter, Google's designee to testify on the topic of the system architecture of SmartAds will be Mr. Alferness.

Liability Topic Nos. 6 and 7 to Google: You clarified that you wanted a witness to explain whether the specific video named in the topics using the words "Relevance" and "Landing Page" referred to the same thing as the specific listed internal document using the words "Relevance" and [REDACTED]. We still do not believe that this explanation makes sense, or is reasonable. Subject to its objections, Google will produce Mr. Alferness to testify generally as to the meaning of the terms [REDACTED] and [REDACTED] as used in G-IPE-0146189. Please confirm that you agree to narrow your topic accordingly.

Damages Topic No. 9 to Google: You explained that this topic seeks information regarding testing of the implementation of Quality Score, including any testing related to whether the use of an advertising system with Quality Score was more valuable than other systems. Based on your explanation, and subject to its objections, Google will provide Mr. Alferness to testify generally as to the kinds of testing performed as to Quality Score, to the extent this information exists.

Inventor Depositions

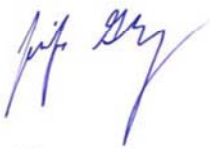
We have responded under separate cover regarding the issue of inventor depositions, which we are continuing to discuss, including during our meet and confer this morning.

* * *

Please note that Defendants are providing witnesses subject to all objections that they have previously made and consistent with the responses they have previously served. Any agreement to produce a witness on a particular topic shall not be deemed an admission that any Defendant has any relevant knowledge concerning a particular topic.

As always, we remain willing to meet and confer to resolve any discovery issues, and hope that you similarly remain willing to work together on these issues in a timely and efficient manner.

Sincerely,



Jen Ghaussy

cc: IPEngine@dicksteinshapiro.com
QE-IPEngine@quinnemanuel.com
01980.51928/4734654.4