

EXHIBIT I

Emily O'Brien

From: Monterio, Charles [MonterioC@dicksteinshapiro.com]
Sent: Monday, July 30, 2012 9:15 AM
To: Emily O'Brien
Cc: zz-IPEngine; QE-IP Engine; senoona@kaufcan.com; 'AOL-IPEngine@finnegan.com'; W. Ryan Snow; 'Donald C. Schultz'
Subject: RE: I/P Engine

Emily,

I write in response to your letter of July 26 regarding the depositions of I/P Engine, Innovate/Protect and Hudson Bay.

With respect to Mr. Berger, to the extent you are hinting otherwise, he was prepared for the deposition. There are no issues of ownership raised by the merger relating to the patents-in-suit. Any other ownership changes beyond that affecting I/P Engine are not relevant to any issue or defense in this case. Nonetheless, as stated during the deposition, I/P Engine will produce documents sufficient to identify the organizational structure, post merger. In short, consistent with the Updated Corporate Disclosure Statement filed by I/P Engine, I/P Engine is a wholly owned subsidiary of Innovate/Protect, Inc., which is a wholly owned subsidiary of Vringo, Inc.

With respect to your second inquiry, none of the communications or information sent to potential investors are responsive to any of Defendants' document requests. Nor is the information relevant to any issue or defense in this case. I/P Engine, Innovate/Protect and Hudson Bay have produced all responsive documents to Defendants' document requests.

Regarding your third inquiry, we are producing the requested document today.

Regarding your final inquiry, we are not producing the consulting agreement between Dickstein Shapiro and Mr. Kosak, and we have produced his agreement with Innovate/Protect. With respect to the Dickstein Shapiro agreement, he is a litigation consultant and we are not obligated to produce such agreements. They are privileged and contain attorney-work product. Further, the agreement is neither relevant nor required to be produced under the rules or any of Defendants' document requests.

Regarding Mr. Lang's documents, if Defendants have something specific that they are concerned with please explain it. Otherwise, it is unclear as to what the issue is here. Again, our clients are in compliance with their discovery requirements. We do not understand why we have to repeatedly confirm this fact for Defendants with respect to an individual or a company. Again, if Defendants have a specific concern we will try to address it. Simply creating non-substantive issues, repeatedly demanding responses to those issues and threatening to go to the court for some unspecified wrong is, in counsel's own words "not only inefficient, but highly wasteful of time and resources."

With respect to your final list of outstanding issues: 1) I/P Engine has already produced the document (*see* IPE 0022792-96); 2) we provided our response on Mr. Heffan and Mr. Abramson on July 24; and 3) we have produced all documents in possession of I/P Engine that are non-privileged and responsive. Again, if Defendants have something specific that they are concerned with, please identify it so that we may address it. As noted above, simply asking I/P Engine whether it is complying with its discovery obligations on every issue is unproductive and inefficient.

Charles

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Dickstein Shapiro LLP
www.DicksteinShapiro.com

From: Emily O'Brien [mailto:emilyobrien@quinnemanuel.com]
Sent: Thursday, July 26, 2012 8:58 PM
To: Monterio, Charles
Cc: zz-IPEngine; QE-IP Engine; senoona@kaufcan.com; 'AOL-IPEngine@finnegan.com'
Subject: I/P Engine

Please see attached correspondence.

Thank you,

Emily O'Brien
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6323 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
emilyobrien@quinnemanuel.com
www.quinnemanuel.com

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