

EXHIBIT 6

**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.)	

**UPDATED EXPERT REPORT OF OPHIR FRIEDER
ON INFRINGEMENT OF U.S. PATENT NOS. 6,314,420 AND 6,775,664**

I. INTRODUCTION

1. I have been retained by Dickstein Shapiro LLP, attorneys for I/P Engine, Inc. (“I/P Engine”) in the above-captioned case, which I understand to be a patent infringement case involving U.S. Patent Nos. 6,314,420 (“the ‘420 patent”) and U.S. Patent No. 6,775,664 (“the ‘664 patent”). I previously submitted a report on July 25, 2012, in which I opined that all asserted claims are infringed.

2. I update my report in view of the Court’s Order of August 16, 2012 (D.I. 212) (“August 16 Order”), and in view of the deposition of Bartholomew Furrow, dated August 3, 2012, the deposition of Derek Cook, dated August 17, 2012, and the deposition of Gary Holt, dated August 23, 2012.

CONFIDENTIAL OUTSIDE COUNSEL ONLY

II. THE COURT'S AUGUST 16 ORDER

3. In an August 16 Order (D.I. 212), the Court changed the construction for the term “collaborative feedback data” from “data from system users regarding what informons such users found to be relevant” to “data from system users with similar interests or needs regarding what informons such users found to be relevant.” My understanding is that the difference between the two constructions is the inclusion of the language “with similar interests or needs.”

4. As illustrated in the updated claim charts, attached as Exhibit 1, the Court’s revised construction in the August 16 Order does not alter my conclusion that all asserted claims are infringed. The evidence relied upon previously satisfies the Court’s revised construction of “collaborative feedback data.”

III. DEPOSITIONS OF BARTHOLOMEW FURROW, DEREK COOK, AND GARY HOLT

5. Since my July 25 report, I attended the deposition of Bartholomew Furrow, and have reviewed portions of the transcripts of the depositions of Derek Cook and Gary Holt. Their testimony supports my theories and conclusions that the Defendants infringe all of the asserted claims.

6. The supplemental claim charts, attached as Exhibit 1, include the portions of the depositions of Mr. Furrow, Mr. Cook, and Mr. Holt that I may rely upon.¹

7. Additionally, the depositions of Mr. Furrow and Mr. Holt further confirmed that AdWords, AdSense for Search, and AdSense for Mobile Search are interrelated systems that, for

¹ I provide a red-lined copy for ease in identifying the updated material (Exhibit 2).

purposes of my report, have no significant differences related to the infringement issues in this case.²

8. The deposition of Mr. Cook clarified that [REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

10. Executed on this 4th day of September 2012, in Washington, DC.

By 
Ophir Frieder

² See, e.g., Deposition of Bartholomew Furrow, dated August 3, 2012 (“Furrow Deposition”) at 99:5-101:3; Deposition of Gary Holt, dated August 23, 2012 (“Holt Deposition”) at 98:5-100:13.

³ See, e.g., Deposition of Derek Cook, dated August 17, 2012 at 63:25-64:7.

⁴ See, e.g., Furrow Deposition at 80:23-81:7; 82:11-21; 83:8-14 [REDACTED] Holt Deposition at 83:20-84:7; see also Furrow Deposition at 121:9-122:5 [REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of September, 2012, the foregoing

UPDATED EXPERT REPORT OF OPHIR FRIEDER ON INFRINGEMENT OF

U.S. PATENT NOS. 6,314,420 AND 6,775,664, was served via email, on the following:

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