

# Exhibit 2

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

L/P ENGINE, INC., )  
)  
Plaintiff, )  
)  
VS. ) CIVIL ACTION NO.  
) 2:11-CV-512  
AOL, INC., et al, )  
)  
Defendants. )

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ORAL/VIDEO DEPOSITION OF  
STEPHEN L. BECKER, Ph.D.  
SEPTEMBER 8, 2012

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CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

ORAL DEPOSITION OF STEPHEN L. BECKER, Ph.D.,  
produced as a witness at the instance of the Defendants,  
was duly sworn, was taken in the above-styled and  
numbered cause on the SEPTEMBER 8, 2012, from 8:24 a.m.  
to 5:54 p.m., before Chris Carpenter, CSR, in and for  
the State of Texas, reported by machine shorthand, at  
the offices of ANDREWS & KURTH, 111 Congress Avenue,  
Suite 1700, Austin, Texas 78701, pursuant to the Federal  
Rules of Civil Procedure and the provisions stated on  
the record or attached hereto.  
Job No. CS416513

1 A. No. Not in the room sort of haggling.

2 Q. The -- what do you understand the accused  
3 product to be in this case?

4 MS. ALBERT: Objection, vague.

5 A. It is Google's AdWords product and AdSense for  
6 Search. And then with respect to, you know, AOL,  
7 there's some other sort of named pieces of that, AdSense  
8 for mobile searches and other accused product that I  
9 understand to be accused, and the AOL's Search  
10 Marketplace, I think was the name of it, that is the  
11 white label version of the Google AdSense that is  
12 accused.

13 Q. (By Mr. Perlson) Have you offered an opinion of  
14 an appropriate level of damages against any party other  
15 than Google in this case?

16 MS. ALBERT: Objection, vague.

17 A. I have -- the opinion that I offered is a  
18 royalty structure and rate that would apply to all of  
19 the ads serving revenue that goes through the accused  
20 Google systems, regardless of whether it is Gannett or  
21 IAC or one of the other defendants, and I've set those  
22 amounts out separately in my report.

23 Q. (By Mr. Perlson) Well, if, let's say, the jury  
24 only found that Gannett was infringing, is there a  
25 number that you could find -- that you could point to in

1 your report that would say this is the appropriate  
2 amount of the damages against Gannett?

3 MS. ALBERT: Objection.

4 A. I believe that number is in there, yes.

5 Q. (By Mr. Perlson) That's in one of the charts or  
6 something?

7 A. It's in one of the exhibits to the report.

8 Q. And you would agree that the patents at issue  
9 in this case do not cover all aspects of AdWords?

10 MS. ALBERT: Objection.

11 A. I'm sorry your voice tailed off there, I didn't  
12 hear the end of that question.

13 Q. (By Mr. Perlson) Sure. You would agree that  
14 the patents at issue in this case do not cover all  
15 aspects of AdWords; is that correct?

16 MS. ALBERT: Objection, vague.

17 A. I agree.

18 Q. (By Mr. Perlson) And you would agree there are  
19 many aspects of AdWords that Google has provided on its  
20 own separate and apart from anything claimed in the  
21 patents-in-suit, correct?

22 MS. ALBERT: Objection, vague.

23 A. Yes.

24 Q. (By Mr. Perlson) And are you -- do you know --  
25 are you familiar with the predicted click-through rate?