

Exhibit H

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

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I/P ENGINE, INC., :
Plaintiff, : Civil Action No.
v. : 2:11-cv-512
AOL, INC., et al., :
Defendants. :

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CONFIDENTIAL - OUTSIDE COUNSEL ONLY

Videotaped Deposition of GANNETT COMPANY, Inc.,

By and through its Corporate Designee,

STEPHEN MICHAEL KURTZ

Tuesday, June 26, 2012

9:06 a.m.

Job No.: 21660

Pages: 1 - 76

Reported by: Debra A. Whitehead

CONFIDENTIAL VIDEOTAPED DEPOSITION OF STEPHEN MICHAEL KURTZ
CONDUCTED ON TUESDAY, JUNE 26, 2012

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| | | |
|----|---|----------|
| 1 | use Google AdSense for Search. | 09:33:32 |
| 2 | Q Is there a way you could get a list of all | 09:33:34 |
| 3 | the websites that use that? | 09:33:39 |
| 4 | A Yeah, I imagine we could. Yes. | 09:33:43 |
| 5 | Q And how would you put together that list? | 09:33:44 |
| 6 | MS. O'BRIEN: Objection. Calls for | 09:33:51 |
| 7 | speculation. | 09:33:52 |
| 8 | A Probably through the ad operations | 09:33:58 |
| 9 | department, could put together that list. | 09:34:02 |
| 10 | Q Is it correct there are some websites of | 09:34:03 |
| 11 | Gannett that use Google AdSense for Search? | 09:34:33 |
| 12 | A I can't answer that definitively, beyond | 09:34:38 |
| 13 | USA Today. | 09:34:43 |
| 14 | Q But USA Today does use Google AdSense for | 09:34:44 |
| 15 | Search? | 09:34:50 |
| 16 | A It does. | 09:34:50 |
| 17 | Q When did Gannett first start using AdSense | 09:34:51 |
| 18 | for Search? | 09:35:06 |
| 19 | MS. O'BRIEN: Objection. Vague. | 09:35:06 |
| 20 | A To the best of my knowledge, March of 2009. | 09:35:13 |
| 21 | Q Is that when Gannett signed an agreement | 09:35:15 |
| 22 | with Google? | 09:35:24 |