

# Exhibit 3

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

I/P ENGINE, INC.,

Plaintiff,

v.

AOL, INC., GOOGLE INC., IAC SEARCH &  
MEDIA, INC., GANNETT COMPANY,  
INC., and TARGET CORPORATION,

Defendants.

No. 2:11-cv-00512-RAJ-FBS

CONFIDENTIAL-OUTSIDE COUNSEL  
ONLY

**DEFENDANT GOOGLE INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF I/P  
ENGINE, INC.'S FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Defendant Google Inc. hereby objects and responds in writing to I/P Engine, Inc.'s First Set of Requests for Admission as served on August 1, 2012.

**GENERAL OBJECTIONS**

The following general objections to Plaintiff's First Set of Requests for Admission are incorporated by reference into Google's response to each individual request:

1. Google objects to Plaintiff's "Requests for Admission" to the extent that they are overbroad, unduly burdensome, harassing, and impose burdens beyond those permitted by the Federal Rules of Civil Procedure.

2. Google objects to Plaintiff's "Requests for Admission" as exceeding the agreed upon limit of 35 requests per party in that Plaintiff served a total of 216 "Requests for Admission," none of which are properly characterized as requests for authentication of documents.

3. Google objects to the definition of the term "document," on the grounds that it is

objects to this Request for Admission to the extent that it calls for the disclosure of information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. Google also objects to this request to the extent it imposes any burden beyond that allowed by the Federal Rules of Civil Procedure, the Local Rules, or any other applicable rules or orders. Google further objects to this request to the extent it seeks information not within the possession, custody, or control of Google.

**RESPONSE TO REQUEST NO. 22:**

Subject to and without waiver of the objections above and without admitting infringement of any asserted claim or limitation therein, Google denies this Request for Admission.

**REQUEST NO. 23:**

Admit that Google is indemnifying co-defendants Target Corporation, IAC Search & Media, Inc., Gannett Company, Inc. and AOL Inc. with respect to their respective use of Google's AdSense for Search or AOL's Search Marketplace systems in the present litigation.

**OBJECTIONS TO REQUEST NO. 23:**

Google incorporates each of the foregoing general objections. Google further objects to this Request for Admission on the grounds that it is vague and ambiguous, particularly as to the term "indemnifying," and that it calls for a legal conclusion. Google objects to this Request for Admission on the grounds it seeks the confidential and/or proprietary information of third parties. Google further objects to this Request for Admission to the extent that it calls for the disclosure of information protected by the attorney-client privilege, the attorney work product

doctrine, or any other applicable privilege. Google also objects to this request to the extent it imposes any burden beyond that allowed by the Federal Rules of Civil Procedure, the Local Rules, or any other applicable rules or orders. Google further objects to this request to the extent it seeks information not within the possession, custody, or control of Google.

**RESPONSE TO REQUEST NO. 23:**

Subject to and without waiver of the objections above and without admitting infringement of any asserted claim or limitation therein, Google responds that on the basis of its objections, it can neither admit nor deny this Request for Admission.

**REQUEST NO. 24:**

Admit that AdSense for Search first used pCTR in 2005.

**OBJECTIONS TO REQUEST NO. 24:**

Google incorporates each of the foregoing general objections. Google further objects to this Request for Admission on the grounds that it is vague and ambiguous, particularly as to the terms "AdSense for Search," "first used" and "pCTR," and that it calls for a legal conclusion. Google further objects to this Request for Admission to the extent that it calls for the disclosure of information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. Google also objects to this request to the extent it imposes any burden beyond that allowed by the Federal Rules of Civil Procedure, the Local Rules, or any other applicable rules or orders. Google further objects to this request to the extent it seeks information not within the possession, custody, or control of Google.