

EXHIBIT J

Joshua Sohn

From: Brothers, Kenneth [BrothersK@dicksteinshapiro.com]
Sent: Wednesday, February 01, 2012 10:33 AM
To: Margaret P. Kammerud; Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine
Subject: RE: I/P Engine v. AOL et al.

Meg:

Our investigation is protected by work product doctrine, and the attorney-client and common interest privileges. We intend to preserve those privileges, and will not divulge the privileged details of our investigation without Defendants' consent to our conditions.

The bottom line is that, contrary to Mr. Blias' understanding and representations, Mr. Kosak never had possession of the contents of the two CD's referenced in Mr. Blias' letter. Instead, Mr. Kosak was sent certain Lycos files that were totally unrelated to this matter. The contents of the two CD's in question were later located on Lycos' servers and were never sent to Mr. Kosak. We had believed that Lycos would produce the contents of those CD's in response to the subpoena from Google. When we received from Google the January 10 letter and then later received from Google the Lycos pass-through productions, we realized that Lycos had not produced those documents. We thereafter have been coordinating with Lycos regarding the production of those documents, which contain Lycos confidential information, and recently received Lycos's permission to produce them to Defendants. We expect that they will be made available soon.

We reiterate our offer to provide full details of our investigation once Defendants accept our conditions.

Ken

-----Original Message-----

From: Margaret P. Kammerud [mailto:megkammerud@quinnemanuel.com]
Sent: Wednesday, February 01, 2012 1:09 PM
To: Brothers, Kenneth; Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine
Subject: RE: I/P Engine v. AOL et al.

Ken,

Please identify the incorrect assumptions and statements in the Lycos letter you refer to in your email. We fail to see how there can be a any legitimate privilege issue in connection with you doing so.

Additionally, please confirm that Plaintiff has produced the contents of the CD identified in the Lycos letter, and if not, explain why.

Regards,
Meg

-----Original Message-----

From: Brothers, Kenneth [mailto:BrothersK@dicksteinshapiro.com]
Sent: Wednesday, February 01, 2012 9:58 AM
To: Margaret P. Kammerud; Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine
Subject: RE: I/P Engine v. AOL et al.

Meg:

We have conducted a detailed investigation, and stand by our prior statements. The Lycos letter contains several incorrect assumptions and statements. We are willing to share the details of our investigation with you on the conditions that I have set forth, which are both necessary and reasonable.

Ken

-----Original Message-----

From: Margaret P. Kammerud [mailto:megkammerud@quinnemanuel.com]
Sent: Wednesday, February 01, 2012 12:53 PM
To: Brothers, Kenneth; Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine
Subject: RE: I/P Engine v. AOL et al.

Ken,

During our meet and confer call on December 16, 2011, you stated that Mr. Kosak did not possess any relevant documents for production. You said that Lycos would produce his documents. On January 10, 2012, Lycos sent us a letter stating: "although Lycos possesses certain electronic file folders containing imaged documents of Don Kosak himself that it believes includes responsive documents, Lycos does not possess the technical capability to open those folders and therefore has been unable to access or view their contents for purposes of production. Nonetheless, per the request of plaintiff's counsel and Mr. Kosak himself, Lycos provided Mr. Kosak with complete copies of those folders on a CD a few months ago and believes he was able to access them." We are entitled to an explanation of this inconsistency -- an explanation you represented you would give us on our meet and confer. Please provide this explanation. Your requested "conditions" are unnecessary and inappropriate.

Regards,
Meg

-----Original Message-----

From: Brothers, Kenneth [mailto:BrothersK@dickesteinshapiro.com]
Sent: Tuesday, January 31, 2012 4:23 PM
To: Margaret P. Kammerud; Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine
Subject: RE: I/P Engine v. AOL et al.

Meg:

We are finalizing our summary of our investigation, which has included multiple privileged interviews and reviews of privileged documents. We are willing to provide Google's counsel with a letter describing our investigation, which is consistent with our earlier representations, on the following conditions: (1) Google agrees in writing that our disclosure of this writing is in no way a waiver of any privilege; or (2) Google shall not seek discovery of any privileged communications relating to this investigation. Once we receive your agreement, we will provide our written narrative to you.

Ken

From: Margaret P. Kammerud [mailto:megkammerud@quinnemanuel.com]
Sent: Tuesday, January 31, 2012 5:15 PM
To: Monterio, Charles; zz-IP Engine
Cc: Noona, Stephen E.; QE-IP Engine

Subject: I/P Engine v. AOL et al.

Dear Charles,

In your January 24, 2011 letter, you stated that I/P Engine is investigating the statements Lycos made in its January 10, 2012 production letter that it provided to Mr. Kosak documents on a CD "per the request of plaintiff's counsel and Mr. Kosak himself." Please promptly provide explain the inconsistency with this statement from counsel for Lycos and Plaintiff's previous representations.

Regards,
Meg

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