

## **Exhibit D-2**

Plaintiff Ward's Motion for Protection from  
 Defendant Cisco Systems, Inc.'s Third Request for  
 Production and "Third" Request for Admissions  
 EXHIBIT D-2

<b>Request No.</b>	<b>Category</b>
1	Cumulative/ redundant
2	Cumulative/ redundant
3	Cumulative/ redundant
4	Irrelevant and overbroad
5	Cumulative/ redundant (Damages Related)
6	Cumulative/ redundant (Damages Related) Requested redaction unduly burdensome
7	Protected information Cumulative/ redundant (Damages Related) Requested redaction unduly burdensome
8	Protected information Cumulative/ redundant
9	Cumulative/ redundant
10	Protected information
11	Protected information
12	Protected information
13	Protected information
14	Irrelevant and overbroad
15	Irrelevant and overbroad
16	Irrelevant and overbroad
17	Cumulative/ redundant
18	Not the subject of this motion
19	Not the subject of this motion
20	Cumulative/ redundant (Damages Related)
21	Cumulative/ redundant

22	Cumulative/ redundant
23	Protected information Not in Ward's possession
24	Protected information Not in Ward's possession
25	Irrelevant and overbroad
26	Irrelevant and overbroad
27	Irrelevant and overbroad
28	Not the subject of this motion
29	Cumulative/ redundant (Damages Related)
30	Irrelevant and overbroad.
31	Protected information Requested redaction unduly burdensome
32	Protected information Requested redaction unduly burdensome
33	Protected information Requested redaction unduly burdensome
34	Protected information Not in Ward's possession