

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION

JOHN WARD, JR.

v.

CISCO SYSTEMS, INC.

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C.A. NO. 08-4022  
JURY TRIAL DEMANDED

**DEFENDANT'S SECOND AMENDED ANSWERS  
TO PLAINTIFF'S INTERROGATORIES**

TO: Plaintiff John Ward, Jr., by and through his attorney of record, Nicholas H. Patton, Patton, Tidwell & Schroeder, LLP, 4605 Texas Boulevard, P.O. Box 5398, Texarkana, Texas 75505-5398.

Defendant Cisco Systems, Inc. ("Defendant" or "Cisco") hereby serves its Second Amended Answers to Plaintiff's First Set of Interrogatories in compliance with the order of the court dated March 30, 2009. These answers supersede the answers previously provided. The objections previously made in response to the interrogatories are reasserted as if repeated verbatim. To the extent these objections have been overruled by the court, they are reasserted here for appellate purposes only.

8. IDENTIFY ALL COMMUNICATIONS and DOCUMENTS CONCERNING whether any CISCO EMPLOYEE should be disciplined, reprimanded, chastised, admonished, warned or corrected CONCERNING the posting of the Troll Tracker October 17, 2007, October 18, 2007 and revised October 18, 2007 posts, and separately and for each COMMUNICATION or DOCUMENT IDENTIFY the DATE, TIME, ALL PERSONS involved, the nature of the COMMUNICATION or the subject-matter of the DOCUMENT, and IDENTIFY all DOCUMENTS CONCERNING each COMMUNICATION.

**RESPONSE:**

Cisco clarifies its prior answer pursuant to the Court's order as follows: The prior answer was intended to cover both oral communications and documents. Cisco does not believe that Rick Frenkel being placed on administrative leave at full pay after the Albritton case was filed pending the company's investigation, as he was, fits into the areas inquired about ("disciplined, reprimanded etc."). In any event, the communications relating to that decision have been testified about by Mallun Yen in her deposition in the Albritton case and counsel for Ward has a copy of that deposition.

9. IDENTIFY all DOCUMENTS AND COMMUNICATIONS between CISCO and any PERSON or COMPANY CONCERNING Ward's Reputation INCLUDING whether CISCO has been asked by any PERSON or COMPANY about Ward, about hiring Ward, or about CISCO's perception of WARD, separately and for each COMMUNICATION DESCRIBE the COMMUNICATION, IDENTIFY the DATE, TIME, PERSONS involved, the purpose of the COMMUNICATION, DESCRIBE the COMMUNICATION, and IDENTIFY ALL DOCUMENTS CONCERNING each COMMUNICATION.

**RESPONSE:**

Email from Reporter asking about Ward  
Date: August 24, 2007  
Time: 8:39 p.m.  
Persons involved: John Gerstein, Rick Frenkel  
Purpose of communication: Reporter asking Mr. Frenkel about Ward  
Description of communication: Reporter asking Mr. Frenkel about Ward  
Document concerning the communication: ARK.000255