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[COUNSEL LISTING ON FOLLOWING PAGE]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PERFECT 10, INC., a California corporation

Plaintiff,

vs.

GOOGLE INC., a corporation; and
DOES 1 through 100, inclusive

Defendants.

AND COUNTERCLAIM

PERFECT 10, INC., a California corporation,

Plaintiff,

vs.

AMAZON.COM, INC., a corporation;
A9.COM, INC., a corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No. CV 04-9484 AHM (SHx)
[Consolidated with Case No. CV 05-4753 AHM (SHx)]

**JOINT STIPULATION RE
GOOGLE INC.'S MOTION TO
DETERMINE THE SUFFICIENCY
OF PERFECT 10 INC.'S
RESPONSES TO GOOGLE'S
REQUESTS FOR ADMISSION,
SETS 1 AND 2**

Hon. Stephen J. Hillman

Courtroom.: 550
Hearing Date: November 17, 2008
Hearing Time: 2:00 pm

Discovery Cutoff: None Set
Pretrial Conference Date: None Set
Trial Date: None Set

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with Case No. CV 05-4753 AHM (SHx)]

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1 **I. INTRODUCTION**

2 Pursuant to Fed. R. Civ. P. 36(a)(6) and Local Rule 37-2.1, Defendant
3 and Counterclaimant Google Inc. (“Google”) and Plaintiff Perfect 10, Inc. (“Perfect
4 10”) submit the following joint stipulation regarding Google’s Motion to Determine
5 the Sufficiency of Perfect 10’s Responses to Google’s Requests for Admission, Sets 1
6 and 2. Google’s Requests for Admission and Perfect 10’s responses are attached to
7 the accompanying Declaration of Rachel M. Herrick in Support of Google’s Motion
8 to Compel (“Herrick Decl.”), at Exhs. A, B, C, & D. Pursuant to Local Rule 37-1,
9 the parties conducted a pre-filing conference of counsel on May 23, 2008 (by letter),
10 August 8, 2008 (by letter), September 17, 2008, and on various dates thereafter. See
11 Herrick Decl., Exhs. E, F & G.

12 **A. GOOGLE’S PRELIMINARY STATEMENT**

13 Google moves for a determination regarding the insufficiency of Perfect
14 10’s responses to Google’s Requests for Admission. Perfect 10 has brought a
15 sprawling and complex intellectual property lawsuit against Google, in which it
16 asserts numerous state and federal claims, publicity rights on behalf of nine persons,
17 and allegations of *millions* of supposed infringements of over 1000 copyright
18 registrations (which purportedly include over 30,000 distinct images). Perfect 10
19 further claims to have sent Google more than 70 purported DMCA notices, allegedly
20 complaining of over one million infringements. Despite the massive dimensions of
21 its claims, Perfect 10 has consistently failed to meet its corresponding responsibility
22 to respond to properly propounded requests for admission which, if adequately
23 answered, would narrow the range of issues for dispositive motion and trial.

24 To date, Google has propounded several hundred Requests concerning
25 issues going to the very core of Perfect 10’s case, including Perfect 10’s own alleged
26 copyrighted works being asserted here, its registrations, its finances, and its purported
27 DMCA notices. Perfect 10's responses have been deficient in numerous respects, and

1 despite extensive meet and confer efforts, the parties have been unable to resolve
2 their dispute.

3 This motion addresses Perfect 10's 786 deficient responses. Of these,
4 645 of the Requests sought admissions regarding the content and sufficiency of 72 of
5 Perfect 10's purported DMCA notices. Google propounded these Requests in order to
6 narrow the disputed facts regarding Perfect 10's alleged DMCA notices, in advance of
7 Google's filing of a motion for partial summary judgment on Google's entitlement to
8 DMCA safe harbor. Despite their clear relevance, and the fact that information
9 regarding Perfect 10's own notices is well within its knowledge, Perfect 10 objected
10 to these Requests, responding deficiently to 167 of them, and flatly refusing to
11 respond to the remaining 478.

12 The remaining 141 Requests at issue in this motion seek admissions
13 designed to narrow the disputed issues regarding Perfect 10's asserted works, Perfect
14 10's claimed damages, Google's qualification for DMCA safe harbors, and Perfect
15 10's theories of liability with respect to its various copyright claims against Google.
16 Indeed, several of these categories of Requests target information that Judge Matz has
17 agreed are appropriately and efficiently obtained via requests for admission. See
18 Herrick Decl., Exh. H (10/6/08 Status Conference Transcript, p. 48) (describing use
19 of requests for admission as "a very direct, informal and cheap way of narrowing the
20 issues. So go ahead and do it. I encourage that."). Nevertheless, in derogation of
21 Rule 36 and Judge Matz's guidance, Perfect 10 has either responded deficiently, or
22 has failed to provide any substantive response whatsoever to these Requests for
23 Admission. Where Perfect 10 did attempt a response, its responses are evasive and
24 incomplete, containing non-responsive commentary, boilerplate statements,
25 inflammatory argument apparently designed to render the answers unusable and
26 meritless objections.

1 Perfect 10's conduct here is unacceptable. "The purpose of Rule 36(a) is
2 to expedite trial by establishing certain material facts as true and thus narrowing the
3 range of issues for trial." Asea, Inc. v. Southern Pacific Transportation Co., 669 F.2d
4 1242, 1245 (9th Cir. 1982). "Parties may not view requests for admission as a mere
5 procedural exercise requiring minimally acceptable conduct. They should focus on
6 the goal of the Rules, full and efficient discovery, not evasion and word play."
7 Marchand v. Mercy Med. Ctr., 22 F.3d 933, 936-37 (9th Cir. 1994). When a party
8 receives deficient responses to its Requests for Admission, it "may move to
9 determine the sufficiency of an answer or objection." Fed. R. Civ. P. 36(a)(6). If the
10 Court determines that the response is insufficient or that objections are not justified,
11 the Court "may order either that the matter is admitted or that an amended answer be
12 served." Id. The decision as to whether requests should be deemed admitted or the
13 responding party should be ordered to serve an amended answer "is left to the sound
14 discretion of the district judge [or magistrate]." Asea, 669 F.2d at 1247.

15 Perfect 10's responses are deficient. Perfect 10's chief complaint is that
16 Google's requests are burdensome. Though Google agrees that responding to them
17 will take time, that burden certainly is not undue. Both parties have served a large
18 number of requests for admission in this case. Perfect 10 itself has served 715
19 requests (which Google answered), and Google has served 962. Serving a large
20 number of requests for admission covering many discrete factual issues in a complex,
21 far ranging case like this one "is not inappropriate, since the purpose of Requests for
22 Admissions is not necessarily to obtain information but to narrow issues for
23 trial." Diedrich v. Dept. of Army, 132 F.R.D. 614, 616 (S.D.N.Y. 1990). Perfect
24 10's flat refusal to respond to fully half of Google's Requests for Admission and its
25 evasive, insufficient, and incomplete responses to several hundred more ignore
26 Perfect 10's obligations under Rule 36.

1 During the meet and confer process regarding these Requests, P10
2 refused to agree to respond to the 478 Requests regarding Perfect 10's DMCA notices
3 unless Google agreed to withdraw several hundred of them. As for Perfect 10's
4 deficient responses to the remaining 308 Requests at issue in this motion, Perfect 10
5 refused to provide a concrete position regarding whether or how it might agree to
6 amend those responses, despite Google's several months of meet and confer efforts.
7 Perfect 10 initially stated that it would consider amending one or more of the
8 responses to Google's Second Set of Requests for Admission identified in Sections
9 III, IV and V below, but later changed its position and refused to amend any of those
10 responses. As for Google's First Set of Requests for Admission, Perfect 10 has
11 refused to identify (1) which responses (if any) it would consider amending, (2)
12 whether those amendments (if any) would address the deficiencies Google had noted,
13 or (3) a date certain by which the amendments would be served. Thus, Google was
14 left with no choice but to proceed with this motion. Perfect 10 has no basis for its
15 failure to respond to relevant and properly propounded requests for admission.
16 Google's motion should be granted.

17 **B. PERFECT 10'S PRELIMINARY STATEMENT**

18 **1. Google's Requests For Admissions Violate This Court's**
19 **Recent Orders And Directives.**

20 Google's almost 500-page Joint Stipulation (Perfect 10 contributes about 10
21 pages) is yet another example of its abuse of the discovery process in the hope of
22 winning the case by dumping a non-ending mountain of busywork on Perfect 10.
23 Google even went so far as to demand that Perfect 10 conduct a one hour meet and
24 confer on the very day that Perfect 10 had to file its supplemental response to Judge
25 Matz's order regarding additional briefing on A9's motion for summary judgment,
26 and Perfect 10 complied.

1 Perfect 10 has answered 484 of Google's requests and offered to answer 100
2 more of Google's choice. Although each request will require additional work by
3 Perfect 10, Google's requests are highly redundant and the answers to 100 additional
4 requests would provide Google with the information it seeks. This is precisely the
5 approach that has been suggested by Judge Matz.

6 Google's 962 requests for admission are antithetical to this Court's recent
7 Orders and directives and the goals and methodology in them. Instead of engaging in
8 necessary, circumscribed discovery, Google is manufacturing new disputes and
9 dusting-off old discovery disputes. Part of Google's arsenal is its 962 requests for
10 admissions.

11 This Court specifically directed the parties to engage in "circumscribed"
12 discovery and to use a sampling approach. The Court set "objectives -- i.e., summary
13 judgment and settlement readiness -- [to be achieved] without 'going the distance' via
14 full-fledged, uncircumscribed discovery." (Exh. A to the Kincaid Decl.; September
15 25, 2008 Order, p. 2.) At the hearing on October 6, 2008, Google's lead counsel,
16 Michael Zeller, argued that the Court should not use this approach, and the Court
17 disagreed. (See, e.g., Exhibit B to the Kincaid Decl.; Transcript of 10/06/08 hearing,
18 p. 18, ll. 4 - 20.) In fact, the Court indicated a willingness to put a complete stay on
19 discovery. (Exh. B to the Kincaid Decl.; *Id.*, p. 38, ll. 7 - 19.)

20 The Court's September 25, 2008 Order requires focused discovery with "the
21 goal" of preparing the cases for summary judgment/settlement talks. The Order
22 contemplates that the parties will undertake discovery work in an orderly procession -
23 - (1) identification of the copyrighted works; (2) figuring out what goes in the
24 spreadsheet; (3) figuring out a proper sample; and (4) preparing a spreadsheet -- to
25 achieve "the goal." Discovery will be limited/primarily focused on the copyrighted
26 works specified in the spreadsheet. Discovery will be based on a sampling method.

27 ("The parties in all these cases somehow succumbed to the all-too-frequent tendency

1 of litigants and lawyers to get side tracked." (Exh. A to the Kincaid Decl.; September
2 25, 2008 Order, p. 1.) The Court's goal is "to ready these cases for Rule 56
3 determinations or for meaningful settlement talks." (*Id.*, pp. 1 -2.) Discovery and
4 case assessment will be "based on a sample of the key pertinent facts." The purpose
5 of the conference is to achieve the objectives of summary judgment/settlement
6 readiness "without 'going the distance' via full-fledged, uncircumscribed
7 discovery." (*Id.*, p. 2.) The Court Order contemplates charts "*but only for a selected*
8 *and relatively small sample of copyrighted works.*" (*Id.*, p. 4; emphasis in the
9 original.) The Court Order states that "After the entries have been made in the
10 spreadsheet, the Court will either limit the discovery to the Perfect 10 Copyrighted
11 Works specified in the spreadsheet or require that discovery be primarily focused on
12 those works." (*Id.*, p. 5.)

13 Google's requests for admission, served long before the Court's recent Orders
14 and directives, should have been tabled altogether. Perfect 10 has unsuccessfully
15 tried to satisfy Google. Perfect 10 responded to 484 of 962 requests for admission,
16 but Google insisted that Perfect 10 answer all 962. Perfect 10 offered to respond to
17 100 additional requests for admission of Google's choice. Google rejected the offer.

18 **2. Google's Motion To Compel Responses To The First Set Of** 19 **Requests For Admission Is Premature.**

20 Google has moved to compel responses to requests for admissions in its first
21 set of requests for admissions and in its second set of requests for admissions. The
22 first set contains 241 requests and the second set contains 721 requests. **The total**
23 **number of requests is 962.** Perfect 10 answered all 241 requests in the first set and
24 243 requests in the second set. **Perfect 10 answered a total of 484 requests.**

25 The motion is premature with respect to the first set of requests for admissions.
26 Google served the first set of requests for admissions on April 3, 2008, and Perfect 10
27

1 served its responses on May 5, 2008. Google sent its meet and confer letter regarding
2 the first request on May 23, 2008, and did no follow-up at all until August 8, 2008.
3 Google waited until August 8 to follow-up because that is the day that Google finally,
4 after seven months of delay, served amended responses to its own responses to
5 Perfect 10's requests for admissions. Counsel met and conferred telephonically on
6 October 13, 2008, and at the meet and confer, Google's counsel only asked Perfect
7 10's counsel to specify the requests Perfect 10 would amend. Perfect 10's counsel
8 stated that Perfect 10 would amend various responses but could not identify each one
9 at that time. On Thursday October 16, 2008, Perfect 10's counsel said, in writing,
10 that she would set forth Perfect 10's position shortly, and then, four days later, on
11 October 20, 2008, Google filed this motion. Perfect 10 would have amended certain
12 responses in the first set of requests for admission, but Google filed its motion before
13 Perfect 10 had a chance to do so. (Kincaid Decl., ¶ 2.)

14 **Perfect 10 is incorporating this Preliminary Statement and the statement**
15 **at page 343, line 12 – page 348, line 23 into each of its portions of this Joint**
16 **Stipulation.**

17 **II. ISSUE NO. 1 : SHOULD P10 BE COMPELLED TO ANSWER**
18 **REQUESTS FOR ADMISSION TO WHICH PERFECT 10 HAS FAILED**
19 **TO PROVIDE A SUBSTANTIVE RESPONSE?**

20 **A. THE REQUESTS AT ISSUE.**

21 **REQUEST FOR ADMISSION NO. 244:**

22 Admit that John Ancell's COMMUNICATION dated May 11, 2001 (control
23 numbered PG_DMCA0005-0009) did not IDENTIFY the ALLEGED
24

1 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
2 COMMUNICATION.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 244**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 245:**

18 Admit that John Ancell's COMMUNICATION dated May 11, 2001 (control
19 numbered PG_DMCA0005-0009) did not IDENTIFY a representative list of the
20 ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at each URL
21 listed in that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 245**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 246:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
12 Ancell's COMMUNICATION dated May 11, 2001 (control numbered
13 PG_DMCA0005-0009).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 246**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 248:**

2 Admit that John Ancell’s COMMUNICATION dated May 15, 2001 (control
3 numbered PG_DMCA0010-0011) did not IDENTIFY the ALLEGED
4 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
5 COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 248**

7 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 249:**

21 Admit that John Ancell’s COMMUNICATION dated May 15, 2001 (control
22 numbered PG_DMCA0010-0011) did not IDENTIFY a representative list of the
23 ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at each URL
24 listed in that COMMUNICATION.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 249**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

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1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 250:**

13 Admit that PERFECT 10 does not own or hold an exclusive license to the
14 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
15 Ancell's COMMUNICATION dated May 15, 2001 (control numbered
16 PG_DMCA0010-0011).

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 250**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 253:**

5 Admit that John Ancell's COMMUNICATION dated May 15, 2001 (control
6 numbered PG_DMCA0012-0015) did not IDENTIFY the ALLEGED
7 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
8 COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 253**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 254:**

24 Admit that John Ancell's COMMUNICATION dated May 15, 2001 (control
25 numbered PG_DMCA0012-0015) did not IDENTIFY a representative list of the
26 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
27 URL listed in that COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 254**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 255:**

16 Admit that PERFECT 10 does not own or hold an exclusive license to the
17 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
18 Ancell’s COMMUNICATION dated May 15, 2001 (control numbered
19 PG_DMCA0012-0015).

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 255**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 258:**

8 Admit that John Ancell's COMMUNICATION dated May 15, 2001 (control
9 numbered PG_DMCA0016-0018) did not IDENTIFY the ALLEGED
10 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
11 COMMUNICATION.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 258**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 259:**

1 Admit that John Ancell's COMMUNICATION dated May 15, 2001 (control
2 numbered PG_DMCA0016-0018) did not IDENTIFY a representative list of the
3 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
4 URL listed in that COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 259**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 260:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
22 Ancell's COMMUNICATION dated May 15, 2001 (control numbered
23 PG_DMCA0016-0018).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 260**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 263:**

12 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
13 numbered PG_DMCA0019-0021) did not IDENTIFY the ALLEGED
14 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
15 COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 263**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 264:**

4 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
5 numbered PG_DMCA0019-0021) did not IDENTIFY a representative list of the
6 ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at each URL
7 listed in that COMMUNICATION.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 264**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 265:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
25 Ancell's COMMUNICATION dated May 18, 2001 (control numbered
26 PG_DMCA0019-0021).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 265**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 268:**

15 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
16 numbered PG_DMCA0022-0024) did not IDENTIFY a representative list of the
17 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
18 URL listed in that COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 268**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 269:**

7 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
8 numbered PG_DMCA0022-0024) did not IDENTIFY the ALLEGED
9 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
10 COMMUNICATION.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 269**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 270:**

26 Admit that PERFECT 10 does not own or hold an exclusive license to the
27 copyrights to all of the IMAGES allegedly displayed at the URLS listed in John

1 Ancell's COMMUNICATION dated May 18, 2001 (control numbered
2 PG_DMCA0022-0024).

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 270**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 273:**

18 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
19 numbered PG_DMCA0025-0028) did not IDENTIFY the ALLEGED
20 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
21 COMMUNICATION.

22 **RESPONSE. TO REQUEST FOR ADMISSION NO. 273**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 274:**

10 Admit that John Ancell's COMMUNICATION dated May 18, 2001 (control
11 numbered PG_DMCA0025-0028) did not IDENTIFY a representative list of the
12 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
13 URL listed in that COMMUNICATION.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 274**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 275:**

2 Admit that PERFECT 10 does not own or hold an exclusive license to the
3 copyrights of all of the IMAGES allegedly displayed at the URLs listed in John
4 Ancell's COMMUNICATION dated May 18, 2001 (control numbered
5 PG_DMCA0025-0028).

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 275**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 278:**

21 Admit that John Ancell's COMMUNICATION dated May 21, 2001 (control
22 numbered PG_DMCA0029-0032) did not IDENTIFY the ALLEGED
23 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
24 COMMUNICATION.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 278**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 279:**

13 Admit that John Ancell's COMMUNICATION dated May 21, 2001 (control
14 numbered PG_DMCA0029-0032) did not IDENTIFY a representative list of the
15 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
16 URL listed in that COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 279**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 280:**

5 Admit that PERFECT 10 does not own or hold an exclusive license to the
6 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
7 Ancell's COMMUNICATION dated May 21, 2001 (control numbered
8 PG_DMCA0029-0032).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 280**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 283:**

24 Admit that John Ancell's COMMUNICATION dated May 21, 2001 (control
25 numbered PG_DMCA0033-0036) did not IDENTIFY the ALLEGED
26 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
27 COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 283**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 284:**

16 Admit that John Ancell’s COMMUNICATION dated May 21, 2001 (control
17 numbered PG_DMCA0033-0036) did not IDENTIFY a representative list of the
18 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
19 URL listed in that COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 284**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 285:**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
10 Ancell's COMMUNICATION dated May 21, 2001 (control numbered
11 PG_DMCA0033-0036).

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 285**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 288:**

1 Admit that John Ancell's COMMUNICATION dated May 21, 2001 (control
2 numbered PG_DMCA0037-0040) did not IDENTIFY the ALLEGED
3 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
4 COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 288**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 289:**

20 Admit that John Ancell's COMMUNICATION dated May 21, 2001 (control
21 numbered PG_DMCA0037-0040) did not IDENTIFY a representative list of the
22 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
23 URL listed in that COMMUNICATION.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 289**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 290:**

12 Admit that PERFECT 10 does not own or hold an exclusive license to the
13 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
14 Ancell's COMMUNICATION dated May 21, 2001 (control numbered
15 PG_DMCA0037-0040).

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 290**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 293:**

4 Admit that John Ancell's COMMUNICATION dated May 22, 2001 (control
5 numbered PG_DMCA0041-0045) did not IDENTIFY the ALLEGED
6 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
7 COMMUNICATION.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 293**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 294:**

23 Admit that John Ancell's COMMUNICATION dated May 22, 2001 (control
24 numbered PG_DMCA0041-0045) did not IDENTIFY a representative list of the
25 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
26 URL listed in that COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 294**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 295:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
17 Ancell's COMMUNICATION dated May 22, 2001 (control numbered
18 PG_DMCA0041-0045).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 295**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 298:**

7 Admit that John Ancell’s COMMUNICATION dated May 22, 2001 (control
8 numbered PG_DMCA0046-0050) did not IDENTIFY the ALLEGED
9 COPYRIGHTED MATERIAL claimed, to be infringed at each URL listed in that
10 COMMUNICATION.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 298**

12 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 299:**

26 Admit that John Ancell’s COMMUNICATION dated May 22, 2001 (control
27 numbered PG_DMCA0046-0050) did not IDENTIFY a representative list of the

1 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
2 URL listed in that COMMUNICATION.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 299**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 300:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
20 Ancell's COMMUNICATION dated May 22, 2001 (control numbered
21 PG_DMCA0046-0050).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 300**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 303:**

10 Admit that John Ancell's COMMUNICATION dated May 22, 2001 (control
11 numbered PG_DMCA0051-0055) did not IDENTIFY the ALLEGED
12 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
13 COMMUNICATION.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 303**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 304:**

2 Admit that John Ancell’s COMMUNICATION dated May 22, 2001 (control
3 numbered PG_DMCA0051-0055) did not IDENTIFY a representative list of the
4 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
5 URL listed in that COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 304**

7 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 305:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in John
23 Ancell’s COMMUNICATION dated May 22, 2001 (control numbered
24 PG_DMCA0051-0055).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 305**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 308:**

13 Admit that Jeffrey Mausner's COMMUNICATION dated May 24, 2001
14 (control numbered PG_DMCA0056-0058) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to have been infringed at each URL listed in
16 that COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 308**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate.

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 309:**

5 Admit that Jeffrey Mausner's COMMUNICATION dated May 24, 2001
6 (control numbered PG_DMCA0056-0058) did not IDENTIFY a representative list of
7 the ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at
8 each URL listed in that COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 309**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 310:**

24 Admit that PERFECT 10 does not own or hold an exclusive license to the
25 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Jeffrey
26 Mausner's COMMUNICATION dated May 24, 2001 (control numbered
27 PG_DMCA0056-0058).

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 310**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 311:**

16 Admit that Jeffrey Mausner’s COMMUNICATION dated May 24, 2001
17 (control numbered PG_DMCA0056-0058) did not contain a statement that the
18 complaining party had a good faith belief that use of the material in the manner
19 complained of was not authorized by the copyright owner, agent, or the law.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 311**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 312:**

8 Admit that Jeffrey Mausner's COMMUNICATION dated May 24, 2001
9 (control numbered PG_DMCA0056-0058) did not contain a statement that the
10 information in the COMMUNICATION was accurate.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 312**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 313:**

26 Admit that Jeffrey Mausner's COMMUNICATION dated May 24, 2001
27 (control numbered PG_DMCA0056-0058) did not contain a statement under penalty

1 of perjury that the complaining party is authorized to act on behalf of the owner of an
2 exclusive right that is allegedly infringed.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 313**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 314:**

18 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
19 (control numbered PG_DMCA0061-0063) is not a notification of claimed copyright
20 infringement under 17 U.S.C. § 512©(3).

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 314**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 316:**

9 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
10 (control numbered PG_DMCA0061-0063) did not IDENTIFY the ALLEGED
11 COPYRIGHTED MATERIAL claimed to have been infringed.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 316**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 317:**

1 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
2 (control numbered PG_DMCA0061-0063) did not IDENTIFY a representative list of
3 the ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 317**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 318:**

19 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
20 (control numbered PG_DMCA0061-0063) did not IDENTIFY the ALLEGED
21 INFRINGING MATERIAL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 318**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 319:**

10 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
11 (control numbered PG_DMCA0061-0063) did not contain a statement that the
12 complaining party had a good faith belief that use of the material in the manner
13 complained of was not authorized by the copyright owner, agent, or the law.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 319**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 320:**

2 Admit that Jeffrey Mausner’s COMMUNICATION dated June 22, 2001
3 (control numbered PG_DMCA0061-0063) did not contain a statement that the
4 information in the COMMUNICATION was accurate.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 320**

6 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 321:**

20 Admit that Jeffrey Mausner’s COMMUNICATION dated June 22, 2001
21 (control numbered PG_DMCA0061-0063) did not contain a statement under penalty
22 of perjury that the complaining party is authorized to act on behalf of the owner of an
23 exclusive right that is allegedly infringed.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 321**

25 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 322:**

12 Admit that Jeffrey Mausner's COMMUNICATION dated June 22, 2001
13 (control numbered PG_DMCA0061-0063) did not comply with the notification
14 requirements of 17 U.S.C. § 512©(3).

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 322**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 323:**

4 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
5 (control numbered PG_DMCA0064-0067) is not a notification of claimed copyright
6 infringement under 17 U.S.C. § 512©(3).

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 323**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 324:**

22 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
23 (control numbered PG_DMCA0064-0067) did not IDENTIFY any ALLEGED
24 COPYRIGHTED MATERIAL claimed to be infringed.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 324**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 325:**

13 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
14 (control numbered PG_DMCA0064-0067) did not IDENTIFY a representative list of
15 the ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 325**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 326:**

4 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
5 (control numbered PG_DMCA0064-0067) did not IDENTIFY the ALLEGED
6 INFRINGING MATERIAL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 326**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 327:**

22 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
23 (control numbered PG_DMCA0064-0067) did not contain a statement that the
24 complaining party had a good faith belief that use of the material in the manner
25 complained of was not authorized by the copyright owner, agent, or the law.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 327**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 328:**

15 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
16 (control numbered PG_DMCA0064-0067) did not contain a statement that the
17 information in the COMMUNICATION was accurate.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 328**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but. not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 329:**

6 Admit that Jeffery Mausner's COMMUNICATION dated June 26, 2001
7 (control numbered PG_DMCA0064-0067) did not contain a statement under penalty
8 of perjury that the complaining party is authorized to act on behalf of the owner of an
9 exclusive right that is allegedly infringed.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 329**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 330:**

25 Admit that Jeffrey Mausner's COMMUNICATION dated June 26, 2001
26 (control numbered PG_DMCA0064-0067) did not comply with the notification
27 requirements of 17 U.S.C. § 512©(3).

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 330**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible; unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 331:**

16 Admit that Jeffrey Mausner’s COMMUNICATION dated June 29, 2001
17 (control numbered PG_DMCA0072-0075) is not a notification of claimed copyright
18 infringement under 17 U.S.C. § 512©(3).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 331**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

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1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 332:**

7 Admit that Jeffrey Mausner's COMMUNICATION dated June 29, 2001
8 (control numbered PG_DMCA0072-0075) did not IDENTIFY any ALLEGED
9 COPYRIGHTED MATERIAL claimed to be infringed.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 332**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in , the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 333:**

25 Admit that Jeffrey Mausner's COMMUNICATION dated June 29, 2001
26 (control numbered PG_DMCA0072-0075) did not IDENTIFY a representative list of
27 the ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 333**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 334:**

16 Admit that Jeffrey Mausner’s COMMUNICATION dated June 29, 2001
17 (control numbered PG_DMCA0072-0075) did not IDENTIFY the ALLEGED
18 INFRINGING MATERIAL.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 334**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 335:**

7 Admit that Jeffrey Mausner’s COMMUNICATION dated June 29, 2001
8 (control numbered PG_DMCA0072-0075) did not contain a statement that the
9 complaining party had a good faith belief that use of the material in the manner
10 complained of was not authorized by the copyright owner, agent, or the law.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 335**

12 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 336:**

26

27

1 Admit that Jeffrey Mausner's COMMUNICATION dated June 29, 2001
2 (control numbered PG_DMCA0072-0075) did not contain a statement that the
3 information in the COMMUNICATION was accurate.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 336**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 337:**

19 Admit that Jeffrey Mausner's COMMUNICATION dated June 29, 2001
20 (control numbered PG_DMCA0072-0075) did not contain a statement under penalty
21 of perjury that the complaining party is authorized to act on behalf of the owner of an
22 exclusive right that is allegedly infringed.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 337**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 338:**

11 Admit that Jeffrey Mausner's COMMUNICATION dated June 29, 2001
12 (control numbered PG_DMCA0072-0075) did not comply with the notification
13 requirements of 17 U.S.C. § 512©(3).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 338**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 339:**

2 Admit that Jeffrey Mausner’s COMMUNICATION dated July 6, 2001 (control
3 numbered PG_DMCA0080-0081) did not comply with the notification requirements
4 of 17 U.S.C. § 512©(3).

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 339**

6 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 341:**

20 Admit that Jeffrey Mausner’s COMMUNICATION dated July 6, 2001 (control
21 numbered PG_DMCA0080-0081) did not IDENTIFY the ALLEGED
22 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
23 COMMUNICATION.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 341**

25 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

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1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 342:**

12 Admit that Jeffrey Mausner's COMMUNICATION dated July 6, 2001
13 (control. numbered PG_DMCA0080-0081) did not IDENTIFY a representative list
14 of the ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at
15 each URL listed in that COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 342**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or , irrelevant.

3 **REQUEST FOR ADMISSION NO. 343:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Jeffrey
6 Mausner's COMMUNICATION dated July 6, 2001 (control numbered
7 PG_DMCA0080-0081).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 343**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 344:**

23 Admit that Norman Zada's COMMUNICATION dated May 31, 2004 (control
24 numbered PG_DMCA0087-0092) did not IDENTIFY the ALLEGED
25 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
26 COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 344**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 345:**

15 Admit that Norman Zada's COMMUNICATION dated May 31, 2004 (control
16 numbered PG_DMCA0087-0092) did not IDENTIFY a representative list of the
17 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
18 URL listed in that COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 345**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 346:**

7 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
8 issues listed in Norman Zada's COMMUNICATION dated May 31, 2004 (control
9 numbered PG_DMCA0087-0092) with that COMMUNICATION.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 346**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 347:**

25 Admit that for one or more of the URLs listed in Norman Zada's
26 COMMUNICATION dated May 31, 2004 (control numbered PG_DMCA0087-0092)

1 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
2 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 347**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 348:**

18 Admit that for at least 47 of the URLs listed in Norman Zada's
19 COMMUNICATION dated May 31, 2004 (control numbered PG_DMCA0087-0092)
20 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
21 be infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 348**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 349:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
12 Zada's COMMUNICATION dated May 31, 2004 (control numbered
13 PG_DMCA0087-0092).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 349**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 350:**

2 Admit that PG_DMCA0087 is a fax transmission verification report stating
3 that “Norm Zadeh” faxed a single page document to 650-618-1499 on May 31, 2004.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 350**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 351:**

19 Admit that Norman Zada’s COMMUNICATION dated June 1, 2004 (control
20 numbered PG_DMCA0096-0102) did not comply with the notification requirements
21 of 17 U.S.C. § 512©(3).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 351**

23 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10

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4735.751320/2624735

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 352:**

10 Admit that Norman Zada's COMMUNICATION dated June 1, 2004 (control
11 numbered PG_DMCA0096-0102) did not IDENTIFY the ALLEGED
12 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
13 COMMUNICATION.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 352**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 353:**

2 Admit that Norman Zada's COMMUNICATION dated June 1, 2004 (control
3 numbered PG_DMCA0096-0102) did not IDENTIFY a representative list of the
4 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
5 URL listed in that COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 353**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 355:**

21 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
22 issues listed in Norman Zada's COMMUNICATION dated June 1, 2004 (control
23 numbered PG_DMCA0096-0102) with that COMMUNICATION.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 355**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 356:**

12 Admit that for at least 49 of the 62 URLs listed in Norman Zada's
13 COMMUNICATION dated June 1, 2004 (control numbered PG_DMCA0096-0102)
14 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
15 be infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 356**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 357:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
6 Zada's COMMUNICATION June 1, 2004 (control numbered PG_DMCA0096-
7 0102).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 357**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 358:**

23 Admit that Norman Zada's COMMUNICATION dated June 4, 2004 (control
24 numbered PG_DMCA0104-0113) did not IDENTIFY the ALLEGED
25 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
26 COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 358**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 359:**

15 Admit that Norman Zada's COMMUNICATION dated June 4, 2004 (control
16 numbered PG_DMCA0104-0113) did not IDENTIFY a representative list of the
17 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
18 URL listed in that COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 359**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 360:**

7 Admit that YOU did not enclose any of the Perfect 10 Magazine issues listed in
8 Norman Zada's COMMUNICATION dated June 4, 2004 (control numbered
9 PG_DMCA0104-0113) with that COMMUNICATION.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 360**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 362:**

25 Admit that for at least 111 of the 124 URLs listed in Norman Zada's
26 COMMUNICATION dated June 4, 2004 (control numbered PG_DMCA0104-0113)

1 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
2 be infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 362**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 363:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
20 Zada's COMMUNICATION dated June 4, 2004 (control numbered
21 PG_DMCA0104-0113).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 363**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more. of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 364:**

10 Admit that Norman Zada's COMMUNICATION dated June 7, 2004 (control
11 numbered PG_DMCA0114-0115) is not a notification of claimed copyright
12 infringement under 17 U.S.C. § 512©(3).

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 364**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 365:**

1 Admit that Norman Zada's COMMUNICATION dated June 7, 2004 (control
2 numbered PG_DMCA0114-0115) did not IDENTIFY a representative list of the
3 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 365**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 366:**

19 Admit that Norman Zada's COMMUNICATION dated June 7, 2004 (control
20 numbered PG_DMCA0114-0115) did not IDENTIFY the ALLEGED INFRINGING
21 MATERIAL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 366**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 367:**

10 Admit that Norman Zada's COMMUNICATION dated June 7, 2004 (control
11 numbered PG_DMCA0114-0115) did not contain a statement that the complaining
12 party had a good faith belief that use of the material in the manner complained of was
13 not authorized by the copyright owner, agent, or the law.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 367**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 368:**

2 Admit that Norman Zada’s COMMUNICATION dated June 7, 2004 (control
3 numbered PG_DMCA0114-0115) did not contain a statement that the information in
4 the COMMUNICATION was accurate.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 368**

6 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already
9 has expended a great deal of time and effort to respond to the 241 previous requests
10 for admissions in Google’s First Set of Requests for Admissions. In addition, Perfect
11 10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 369:**

20 Admit that Norman Zada’s COMMUNICATION dated June 7, 2004 (control
21 numbered PG_DMCA0114-0115) did not contain a statement under penalty of
22 perjury that the complaining party is authorized to act on behalf of the owner of an
23 exclusive right that is allegedly infringed.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 369**

25 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 370:**

12 Admit that Norman Zada's COMMUNICATION dated June 16, 2004 (control
13 numbered PG_DMCA0116-0127) did not IDENTIFY the ALLEGED
14 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
15 COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 370**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 371:**

4 Admit that Norman Zada's COMMUNICATION dated June 16, 2004 (control
5 numbered PG_DMCA0116-0127) did not IDENTIFY a representative list of the
6 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
7 URL listed in that COMMUNICATION.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 371**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 374:**

23 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
24 issues listed in Norman Zada's COMMUNICATION dated June 16, 2004 (control
25 numbered PG_DMCA0116-0127) with that COMMUNICATION.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 374**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 375:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
17 Zada's COMMUNICATION dated June 16, 2004 (control numbered
18 PG_DMCA0116-0127).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 375**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 1.0 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 376:**

7 Admit that Norman Zada's COMMUNICATIONS dated May 31, 2004
8 (control numbered PG_DMCA0087-0092), June 1, 2004 (control numbered
9 PG_DMCA0096-0102), June 4, 2004 (control numbered PG_DMCA0116-0127), and
10 June 16, 2004 (control numbered PG_DMCA0116-0127) list
11 <http://pix.alronix.net/Photo Scans/Tits/Lisa Fuxler/pic00074.htm> as an INFRINGING
12 URL.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 376**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 377:**

1 Admit that Norman Zada's COMMUNICATIONS dated May 31, 2004
2 (control numbered PG_DMCA0087-0092), June 1, 2004 (control numbered
3 PG_DMCA0096-0102), June 4, 2004 (control numbered PG_DMCA0116-0127), and
4 June 16, 2004 (control numbered PG_DMCA0116-0127) list
5 [http://sub.links2.free.fr/data/Sasha Brinkova/01/vc/SashaBrinkova01 JPG.html](http://sub.links2.free.fr/data/Sasha%20Brinkova/01/vc/SashaBrinkova01.JPG.html) as an
6 INFRINGING URL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 377**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 378:**

22 Admit that Norman Zada's COMMUNICATIONS dated May 31, 2004
23 (control numbered PG_DMCA0087-0092), June 1, 2004 (control numbered
24 PG_DMCA0096-0102), June 4, 2004 (control numbered PG_DMCA0116-0127), and
25 June 16, 2004 (control numbered PG_DMCA0116-0127) list
26 <http://www.ottoperuna.com/Archivio/AAAA/AshleyDegenford/Pagine/002.htm> as an
27 INFRINGING URL.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 378**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 379:**

16 Admit that Norman Zada’s COMMUNICATION dated June 28, 2004 (control
17 numbered PG_DMCA0128-0141) did not IDENTIFY the ALLEGED
18 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
19 COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 379**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 384:**

8 Admit that the web page located at
9 russiancelebrities.org/rclGallery.asp?GID=4, listed in Norman Zada's
10 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0131),
11 displayed only one of the eight IMAGES contained within the ten-page section of the
12 Perfect 10 Magazine YOU identified as the ALLEGED COPYRIGHTED
13 MATERIAL YOU claim was infringed.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 384**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 387:**

2 Admit that for at least 57 of the URLs listed in Norman Zada's
3 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-0141)
4 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
5 be infringed at each of those URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 387**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 388:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES displayed at the URLs listed in Norman Zada's
23 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-
24 0141).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 388**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 389:**

13 Admit that Norman Zada's COMMUNICATION dated July 6, 2004 (control
14 numbered PG_DMCA0160-0173) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 389**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of-the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 390:**

5 Admit that Norman Zada's COMMUNICATION dated July 6, 2004 (control
6 numbered PG_DMCA0160-0173) did not IDENTIFY a representative list of the
7 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
8 URL listed in that COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 390**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 396:**

24 Admit that for at least 57 of the URLs listed in Norman Zada's
25 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-0173)
26 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
27 be infringed at each of those URLs.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 396**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 397:**

16 Admit that PERFECT 10 does not own or hold an exclusive license to the
17 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
18 Zada’s COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-
19 0173).

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 397**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 398:**

8 Admit that the web page located at
9 russiancelebrities.org/rc1Set.asp?GID=4&PID=494&SID=1, listed in Norman Zada's
10 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0163),
11 infringed only one of the eight IMAGES contained within the eight-page section of
12 the Perfect 10 Magazine YOU identified as the ALLEGED COPYRIGHTED
13 MATERIAL YOU claim was infringed.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 398**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 399:**

2 Admit that the web page located at
3 ottoperuna.altervista.org/pagine/K/KonyievaZoya/Zoya_Konieva_02.htm, listed in
4 Norman Zada's COMMUNICATION dated July 6, 2004 (control numbered
5 PG_DMCA0165), infringed only one of the seven IMAGES contained within the
6 eight-page section of the Perfect 10 Magazine YOU identified as the ALLEGED
7 COPYRIGHTED MATERIAL YOU claim was infringed.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 399**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions* Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 400:**

23 Admit that Norman Zada's COMMUNICATION dated July 11, 2004 (control
24 numbered PG_DMCA0232-0245) did not IDENTIFY the ALLEGED
25 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
26 COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 400**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests, for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 407:**

15 Admit that for at least 57 of the URLs listed in Norman Zada's
16 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
17 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
18 be infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 407**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10, from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 408:**

7 Admit that PERFECT 10 does not own or hold an exclusive license to the
8 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
9 Zada's COMMUNICATION dated July 11, 2004 (control numbered
10 PG_DMCA0232-0245).

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 408**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 409:**

26 Admit that Norman Zada's COMMUNICATION dated July 19, 2004 (control
27 numbered PG_DMCA0246-0298) did not IDENTIFY the ALLEGED

1 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
2 COMMUNICATION.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 409**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 416:**

18 Admit that for at least 57 of the URLs listed in Norman Zada's
19 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)
20 YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL claimed to
21 be infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 416**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 417:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
12 Zada's COMMUNICATION dated July 19, 2004 (control numbered
13 PG_DMCA0246-0298).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 417.**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 418:**

2 Admit that the INFRINGING URLS listed in Norman Zada's
3 COMMUNICATIONS dated June 28, 2004 (control numbered PG_DMCA0142-
4 0158), July 6, 2004 (control numbered PG_DMCA0160-0173), and July 11, 2004
5 (control numbered PG_DMCA0232-0245) are identical.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 418**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 419:**

21 Admit that 316 of the 376 INFRINGING URLS listed in Norman Zada's
22 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)
23 are identical to the INFRINGING URLS listed in Norman Zada's
24 COMMUNICATIONS dated June 28, 2004 (control numbered PG_DMCA0142-
25 0158), July 6, 2004 (control numbered PG_DMCA0160-0173), and July 11, 2004
26 (control numbered PG_DMCA0232-0245).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 419**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 420:**

15 Admit that Norman Zada's COMMUNICATION dated October 11, 2004
16 (control numbered PG_DMCA0299-0307) did not IDENTIFY the ALLEGED
17 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
18 COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 420**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 428:**

7 Admit that PERFECT 10 does not own or hold an exclusive license to the
8 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
9 Zada's COMMUNICATION dated October 11, 2004 (control numbered
10 PG_DMCA0299-0307).

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 428**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO 429:**

26 Admit that Norman Zada's COMMUNICATION dated November 2, 2004
27 (control numbered PG_DMCA0323-0332) did not IDENTIFY the ALLEGED

1 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
2 COMMUNICATION.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 429**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 436:**

18 Admit that for one or more of the URLs listed in Norman Zada's
19 COMMUNICATION dated November 2, 2004 (control numbered PG_DMCA0323-
20 0332) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
21 claimed to be infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 436**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 437:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
12 Zada's COMMUNICATION dated November 2, 2004 (control numbered
13 PG_DMCA0323-0332).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 437**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 438:**

2 Admit that Norman Zada’s COMMUNICATION dated November 8, 2004
3 (control numbered PG_DMCA0343-0352) did not IDENTIFY the ALLEGED
4 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
5 COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 438**

7 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to. the 241 previous requests for
11 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions.. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 444:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLS listed in Norman
23 Zada’s COMMUNICATION dated November 8, 2004 (control numbered
24 PG_DMCA0343-0352).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 444**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

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1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 445:**

13 Admit that Norman Zada's COMMUNICATION dated November 16, 2004
14 (control numbered PG_DMCA0360-0370) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 445**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 450:**

5 Admit that PERFECT 10 does not own or hold an exclusive license to the
6 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
7 Zada's COMMUNICATION dated November 16, 2004 (control numbered
8 PG_DMCA0343-0352).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 450**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 451:**

24 Admit that Norman Zada's COMMUNICATION dated November 18, 2004
25 (control numbered PG_DMCA0376-0384) did not IDENTIFY the ALLEGED
26 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
27 COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 451**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 457:**

16 Admit that for one or more of the URLs listed in Norman Zada’s
17 COMMUNICATION dated November 18, 2004 (control numbered PG_DMCA0376-
18 0384) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
19 claimed to be infringed at each of those URLs.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 457**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 458**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
10 Zada's COMMUNICATION dated November 18, 2004 (control numbered
11 PG_DMCA0376-0384).

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 458**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 459:**

1 Admit that Norman Zada's COMMUNICATION dated November 26, 2004
2 (control numbered PG_DMCA0389-0401) did not IDENTIFY the ALLEGED
3 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
4 COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 459**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 466:**

20 Admit that for one or more of the URLs listed in Norman Zada's
21 COMMUNICATION dated November 26, 2004 (control numbered PG_DMCA0389-
22 0401) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
23 claimed to be infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 466**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 467:**

12 Admit that PERFECT 10 does not own or hold an exclusive license to the
13 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
14 Zada's COMMUNICATION dated November 26, 2004 (control numbered
15 PG_DMCA0389-0401).

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 467**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort, to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 468:**

4 Admit that Norman Zada's COMMUNICATION dated December 1, 2004
5 (control numbered PG_DMCA0411_A_01-09 and PG_DMCA_A_14) did not
6 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
7 each URL listed in that COMMUNICATION.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 468**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 475:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated December 1, 2004 (control numbered
25 PG_DMCA0411_A_01-09 and PG_DMCA_A_14) YOU did not IDENTIFY any
26 ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at each of those
27 URLs.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 475**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 476:**

16 Admit that PERFECT 10 does not own or hold an exclusive license to the
17 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
18 Zada’s COMMUNICATION dated December 1, 2004 (control numbered
19 PG_DMCA0411_A_01-09 and PG_DMCA_A_14).

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 476**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 477:**

8 Admit that Norman Zada's COMMUNICATION dated December 9, 2004
9 (control numbered PG_DMCA0411_B_01-09 and PG_DMCA_B_15) did not
10 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
11 each URL listed in that COMMUNICATION.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 477**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 483:**

1 Admit that for one or more of the URLs listed in Norman Zada's
2 COMMUNICATION dated December 9, 2004 (control numbered
3 PG_DMCA0411_B_01-09 and PG_DMCA_B_15) YOU did not IDENTIFY any
4 ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 483**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 484:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
23 Zada's COMMUNICATION dated December 9, 2004 (control numbered
24 PGDMCA0411_B_01-09 and PG_DMCA_B_15).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 484**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 485:**

13 Admit that Norman Zada's COMMUNICATION dated December 21, 2004
14 (control numbered PG_DMCA0412-0422) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 485**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 490:**

5 Admit that the 24-page section of volume 2 number 1 of Perfect 10 Magazine,
6 identified as the ALLEGED COPYRIGHTED MATERIAL YOU claim was
7 infringed at
8 russiancelebrities.org/rcIView.asp?PID=482&SID=1&11D=5668&Order=1&small=2
9 , contains at least 21 ADULT IMAGES.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 490**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 491:**

25 Admit that the 24-page section of volume 2 number 1 of Perfect 10 Magazine,
26 identified as the ALLEGED COPYRIGHTED MATERIAL YOU claim was
27 infringed at russiancelebrities.org/rcIView.asp?PID=482&SID=1

1 &11D=5668&Order=1 &small= 2, contains MULTIPLE ADULT IMAGES of
2 MULTIPLE models.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 491**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 494:**

18 Admit that for one or more of the URLs listed in Norman Zada's
19 COMMUNICATION dated December 21, 2004 (control numbered PG_DMCA0412-
20 0422) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
21 claimed to be infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 494**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

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1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 495:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
12 Zada's COMMUNICATION dated December 21, 2004 (control numbered
13 PG_DMCA0412-0422).

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 495**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 496:**

2 Admit that Norman Zada's COMMUNICATION dated December 27, 2004
3 (control numbered PG_DMCA0428-0437) did not IDENTIFY the ALLEGED
4 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
5 COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 496**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 503:**

21 Admit that for one or more of the URLs listed in Norman Zada's
22 COMMUNICATION dated December 27, 2004 (control numbered PG_DMCA0428-
23 0437) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
24 claimed be infringed at each of those URLs.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 503**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 504:**

13 Admit that PERFECT 10 does not own or hold an exclusive license to the
14 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
15 Zada's COMMUNICATION dated December 27, 2004 (control numbered
16 PG_DMCA0428-0437).

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 504**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 505:**

5 Admit that Norman Zada's COMMUNICATION dated December 29, 2004
6 (control numbered PG_DMCA0446-0454) did not IDENTIFY the ALLEGED
7 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
8 COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 505**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 512:**

24 Admit that PERFECT 10 does not own or hold an exclusive license to the
25 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
26 Zada's COMMUNICATION dated December 29, 2004 (control numbered
27 PG_DMCA0446-0454).

1 **RESPONSE TO REQUEST FOR ADMISSION NO 512**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case.. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 513:**

16 Admit that Norman Zada’s COMMUNICATION dated December 31, 2004
17 (control numbered PG_DMCA0462-0470) did not IDENTIFY the ALLEGED
18 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
19 COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 513**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 516:**

8 Admit that for at least 72 of the 91 URLs listed in Norman Zada's
9 COMMUNICATION dated December 31, 2004 (control numbered PG_DMCA0462-
10 0470) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
11 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 516**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 517:**

1 Admit that for at least 26 of the 91 URLs listed in Norman Zada's
2 COMMUNICATION dated December 31, 2004 (control numbered PG_DMCA0462-
3 0470) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 517**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 519:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the.
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
23 Zada's COMMUNICATION dated December 31, 2004 (control numbered
24 PG_DMCA0462-0470).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 519**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

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1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 'previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 520:**

13 Admit that Norman Zada's COMMUNICATION dated January 3, 2005
14 (control numbered PG_DMCA0485-0495) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 520**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately !of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 526:**

5 Admit that PERFECT 10 does not own or hold an exclusive license to the
6 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
7 Zada's COMMUNICATION dated January 3, 2005 (control numbered
8 PG_DMCA0485-0495).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 526**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 527:**

24 Admit that Norman Zada's COMMUNICATION dated January 16, 2005
25 (control numbered PG_DMCA0512-0521) did not IDENTIFY the ALLEGED
26 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
27 COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 527**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO 534:**

16 Admit that for one or more of the URLs listed in Norman Zada’s
17 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
18 0521) YOU identified “Perfect 10 DVD” as the ALLEGED COPYRIGHTED
19 MATERIAL YOU claim was infringed at each of those URLs.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 534**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 535:**

8 Admit that the “Perfect 10 DVD” referenced in Norman Zada’s
9 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
10 0521) contains MULTIPLE IMAGES of MULTIPLE models.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 535**

12 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 536:**

26

27

1 Admit that YOU did not enclose a copy of the “Perfect 10 DVD” referenced in
2 Norman Zada’s COMMUNICATION dated January 16, 2005 (control numbered
3 PG_DMCA0512-0521) with that COMMUNICATION.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 536**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 537:**

19 Admit that PERFECT 10 does not own or hold an exclusive license to the
20 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
21 Zada’s COMMUNICATION dated January 16, 2005 (control numbered
22 PG_DMCA0512-0521).

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 537**

24 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 538:**

11 Admit that Norman Zada's COMMUNICATION dated January 21, 2005
12 (control numbered PG_DMCA0531-0539) did not IDENTIFY the ALLEGED
13 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
14 COMMUNICATION.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 538**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the. 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 545:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
6 Zada's COMMUNICATION dated January 21, 2005 (control numbered
7 PG_DMCA0531-0539).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 545**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 546:**

23 Admit that Norman Zada's COMMUNICATION dated January 25, 2005
24 (control numbered GGL000778-000782) did not IDENTIFY the ALLEGED
25 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
26 COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 546**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 553:**

15 Admit that for one or more of the URLs listed in Norman Zada's
16 COMMUNICATION dated January 25, 2005 (control numbered GGL000778-
17 000782) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
18 MATERIAL YOU claim was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 553**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 554:**

7 Admit that PERFECT 10 does not own or hold an exclusive license to the
8 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
9 Zada's COMMUNICATION dated January 25, 2005 (control numbered
10 GGL000778-000782).

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 554**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 555:**

26 Admit that Norman Zada's COMMUNICATION dated February 3, 2005
27 (control numbered PG_DMCA0560-0568) did not IDENTIFY the ALLEGED

1 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
2 COMMUNICATION.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 555**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 563:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
20 Zada's COMMUNICATION dated February 3, 2005 (control numbered
21 PG_DMCA0560-0568).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 563**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 564:**

10 Admit that Norman Zada's COMMUNICATION dated February 7, 2005
11 (control numbered PG_DMCA0574-0587) did not IDENTIFY the ALLEGED
12 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
13 COMMUNICATION.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 564**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 571:**

2 Admit that for one or more of the URLs listed in Norman Zada's
3 COMMUNICATION dated February 7, 2005 (control numbered PG_DMCA0574-
4 0587) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
5 claimed to be infringed at each of those URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 571**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 572**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
23 Zada's COMMUNICATION dated February 7, 2005 (control numbered
24 PG_DMCA0574-0587).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 572**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do. so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 573:**

13 Admit that Norman Zada's COMMUNICATION dated February 11, 2005
14 (control numbered PG_DMCA0592-0603) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 573**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 580:**

5 Admit that for one or more of the URLs listed in Norman Zada's
6 COMMUNICATION dated February 11, 2005 (control numbered PG_DMCA0592-
7 0.603) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
8 claimed to be infringed at each of those URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 580**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 581:**

24 Admit that PERFECT 10 does not own or hold an exclusive license to the
25 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
26 Zada's COMMUNICATION dated February 11, 2005 (control numbered
27 PG_DMCA0592-0603).

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 581**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 582:**

16 Admit that Norman Zada’s COMMUNICATION dated February 17, 2005
17 (control numbered PG_DMCA0608-0620) did not IDENTIFY the ALLEGED
18 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
19 COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 582**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 589:**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
10 Zada's COMMUNICATION dated February 17, 2005 (control numbered
11 PG_DMCA0608-0620).

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 589**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 590:**

1 Admit that Norman Zada's COMMUNICATION dated March 6, 2005 (control
2 numbered PG_DMCA0621-0636) did not IDENTIFY the ALLEGED
3 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
4 COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 590**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO 597:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
22 Zada's COMMUNICATION dated March 6, 2005 (control numbered
23 PG_DMCA0621-0636).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 597**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 598:**

12 Admit that Norman Zada's COMMUNICATION dated April 3, 2005 (control
13 numbered PG_DMCA0637-0652) did not IDENTIFY the ALLEGED
14 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
15 COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 598**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 605:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
6 Zada's COMMUNICATION dated April 3, 2005 (control numbered
7 PG_DMCA0637-0652).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 605**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 606:**

23 Admit that Norman Zada's COMMUNICATION dated April 11, 2005 (control
24 numbered PG_DMCA0653-0668) did not IDENTIFY the ALLEGED
25 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
26 COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 606**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 607:**

15 Admit that Norman Zada's COMMUNICATION dated April 11, 2005 (control
16 numbered PG_DMCA0653-0668) did not IDENTIFY a representative list of the
17 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
18 URL listed in that COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 607**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 613:**

7 Admit that for one or more of the URLs listed in Norman Zada's
8 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
9 0668) YOU identified "Perfect 10 Model Boxing DVD" as the ALLEGED
10 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 613**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 614:**

26

27

1 Admit that the “Perfect 10 Model Boxing DVD” referenced in Norman Zada’s
2 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
3 0668) contains MULTIPLE IMAGES of MULTIPLE models.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 614**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 615:**

19 Admit that YOU did not enclose a copy of the “Perfect 10 Model Boxing
20 DVD” referenced in Norman Zada’s COMMUNICATION dated April 11, 2005
21 (control numbered PG_DMCA0653-0668) with that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 615**

23 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10

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28

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 616:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
12 Zada's COMMUNICATION dated April 11, 2005 (control numbered
13 PG_DMCA0653-0668).

14 **RESPONSE TO REQUEST FOR ADMISSION NO 616**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 617:**

2 Admit that Norman Zada's COMMUNICATION dated May 1, 2005 (control
3 numbered PG_DMCA0669-0676) did not IDENTIFY the ALLEGED
4 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
5 COMMUNICATION.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 617**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect .10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 623:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
23 Zada's COMMUNICATION dated May 1, 2005 (control numbered
24 PG_DMCA0669-0676).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 623**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 624:**

13 Admit that Norman Zada's COMMUNICATION dated May 7, 2005 (control
14 numbered PG_DMCA0677-0686) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 624**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 630:**

5 Admit that PERFECT 10 does not own or hold an exclusive license to the
6 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
7 Zada's COMMUNICATION dated May 7, 2005 (control numbered
8 PG_DMCA0677-0686).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 630**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 631:**

24 Admit that Norman Zada's COMMUNICATION dated June 12, 2005 (control
25 numbered PG_DMCA0693-0707) did not IDENTIFY the ALLEGED
26 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
27 COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 631**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 632:**

16 Admit that Norman Zada’s COMMUNICATION dated June 12, 2005 (control
17 numbered PG_DMCA0693-0707) did not IDENTIFY a representative list of the
18 ALLEGED COPYRIGHTED MATERIAL claimed to have been infringed at each
19 URL listed in that COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 632**

21 Perfect. 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 639:**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
10 Zada's COMMUNICATION dated June 12, 2005 (control numbered
11 PG_DMCA0693-0707).

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 639.**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 640:**

1 Admit that Norman Zada's COMMUNICATION dated June 19, 2005 (control
2 numbered GGL000745-000752) did not IDENTIFY the ALLEGED
3 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
4 COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 640**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 647:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
22 Zada's COMMUNICATION dated June 19, 2005 (control numbered GGL000745-
23 000752).

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 647**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 648:**

12 Admit that Norman Zada's COMMUNICATION dated July 16, 2005 (control
13 numbered GGL005781-5798) did not IDENTIFY the ALLEGED COPYRIGHTED
14 MATERIAL claimed to be infringed at each URL listed in that COMMUNICATION.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 648**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 656:**

4 Admit that for one or more of the URLs listed in Norman Zada's
5 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)
6 YOU did not identify the ALLEGED COPYRIGHTED MATERIAL YOU claim was
7 infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 656**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 657:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
25 Zada's COMMUNICATION dated July 16, 2005 (control numbered GGL005781-
26 5798).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 657**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 658:**

15 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
16 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798) did
17 not display any IMAGES.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 658**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 659:**

6 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
7 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798) did
8 not display any ADULT IMAGES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 659**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 660:**

24 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
25 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798) did
26 not display any PERFECT 10 IMAGES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 660**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 661:**

15 Admit that Norman Zada's COMMUNICATION dated July 16, 2005 (control
16 numbered GGL005781-5798) lists INFRINGING URLS identified using AOL's
17 search engine, not GOOGLE'S search engine.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 661**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 662:**

6 Admit that Norman Zada's COMMUNICATION dated July 26, 2005 (control
7 numbered GGL001351-1361) did not IDENTIFY the ALLEGED COPYRIGHTED
8 MATERIAL claimed to be infringed at each URL listed in that COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 662**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First. Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 665:**

24 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
25 issues listed in Norman Zada's COMMUNICATION dated July 26, 2005 (control
26 numbered GGL001351-1361) with that COMMUNICATION.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 665**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to -admit or deny all of
10 these 720 requests,, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 668:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
17 Zada's COMMUNICATION dated July 26, 2005 (control numbered GGL001351-
18 1361).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 668**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 669:**

7 Admit that Norman Zada's COMMUNICATION dated August 30, 2005
8 (control numbered GGL005305-5312) did not IDENTIFY the ALLEGED
9 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
10 COMMUNICATION.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 669**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 675:**

26 Admit that for one or more of the URLs listed in Norman Zada's
27 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)

1 YOU did not identify any ALLEGED COPYRIGHTED MATERIAL claimed to be
2 infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 675**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 676:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
20 Zada's COMMUNICATION dated August 30, 2005 (control numbered GGL005305-
21 5312).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 676**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

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1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each, request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 677:**

10 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
11 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
12 did not display any IMAGES.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 677**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 678:**

1 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
2 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
3 did not display any ADULT IMAGES.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 678**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 679:**

19 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
20 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
21 did not display any PERFECT 10 IMAGES.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 679**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 680:**

10 Admit that Norman Zada's COMMUNICATION dated September 27, 2005
11 (control numbered GGL005913-005924) did not IDENTIFY-the ALLEGED
12 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
13 COMMUNICATION.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 680**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 682:**

2 Admit that for each of the 247 URLs listed in Norman Zada's
3 COMMUNICATION dated September 27, 2005 (control numbered
4 GGL005913005924) YOU identified perfect10.com as the ALLEGED
5 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 682**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 683:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
23 Zada's COMMUNICATION dated September 27, 2005 (control numbered
24 GGL005913-005924).

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 683**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 684:**

13 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
14 COMMUNICATION dated September 27, 2005 (control numbered GGL005913-
15 005924) did not display any IMAGES.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 684**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 685:**

4 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
5 COMMUNICATION dated September 27, 2005 (control numbered GGL005913-
6 005924) did not display any ADULT IMAGES.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 685**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the. Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 686:**

22 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
23 COMMUNICATION dated September 27, 2005 (control numbered GGL005913-
24 005924) did not display any PERFECT 10 IMAGES.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 686**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 687:**

13 Admit that Norman Zada's COMMUNICATION dated December 7, 2005
14 (control numbered GGL006200-006207) did not IDENTIFY the ALLEGED
15 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
16 COMMUNICATION.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 687**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 691:**

5 Admit that for one or more of the URLs listed in Norman Zada's
6 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
7 006207) YOU identified "Perfect 10 Model Boxing DVD" as the ALLEGED
8 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 691**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 692:**

24 Admit that the "Perfect 10 Model Boxing DVD" referenced in Norman Zada's
25 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
26 006207) contains MULTIPLE IMAGES of MULTIPLE models.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 692**

1 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 693:**

15 Admit that YOU did not enclose a copy of the “Perfect 10 Model Boxing
16 DVD” referenced in Norman Zada’s COMMUNICATION dated December 7, 2005
17 (control numbered GGL006200-006207) with that COMMUNICATION.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 693**

19 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 694:**

6 Admit that for one or more of the URLs listed in Norman Zada's
7 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
8 006207) YOU did not IDENTIFY any ALLEGED COPYRIGHTED MATERIAL
9 claimed to be infringed at those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 694**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 695:**

25 Admit that PERFECT 10 does not own or hold an exclusive license to the
26 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman

1 Zada's COMMUNICATION dated December 7, 2005 (control numbered
2 GGL006200-006207).

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 695**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 696:**

18 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
19 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
20 006207) did not display any IMAGES.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 696**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 697:**

9 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
10 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
11 006207) did not display any ADULT IMAGES.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 697**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 698:**

1 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
2 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
3 006207) did not display any PERFECT 10 IMAGES.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 698**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 699:**

19 Admit that Norman Zada's COMMUNICATION dated December 9, 2005 did
20 not comply with the notification requirements of 17 U.S.C. § 512©(3).

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 699**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would fake an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 700:**

9 Admit that Norman Zada's COMMUNICATION dated December 9, 2005 did
10 not IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be
11 infringed.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 700**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 702:**

1 Admit that the DVD provided with Norman Zada's COMMUNICATION
2 dated December 9, 2005 contains 35 folders comprising more than 25,000 pages of
3 ALLEGED INFRINGING MATERIAL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 702**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 1720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 703:**

19 Admit that PERFECT 10 does not own or hold an exclusive license to the
20 copyrights to all of the IMAGES displayed in the electronic files on the DVD
21 provided with Norman Zada's COMMUNICATION dated December 9, 2005.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 703**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 704:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES displayed on the USENET SITES identified on the
12 DVD provided with Norman Zada's COMMUNICATION dated December 9, 2005.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 704**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 705:**

1 Admit that Norman Zada's COMMUNICATION dated December 22, 2005
2 (control numbered GGL005313-005334) did not IDENTIFY the ALLEGED
3 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
4 COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 705**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 707:**

20 Admit that for at least 494 of the 680 URLS listed in Norman Zada's
21 COMMUNICATION dated December 22, 2005 (control numbered GGL005313-
22 005334) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
23 MATERIAL YOU claim was infringed at each of those URLS.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 707**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 709:**

12 Admit that PERFECT 10 does not own or hold an exclusive license to the
13 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
14 Zada's COMMUNICATION dated December 22, 2005 (control numbered
15 GGL005313-005334).

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 709**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 710:**

4 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
5 COMMUNICATION dated December 22, 2005 (control numbered GGL0053 13-
6 005334) did not display any IMAGES.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 710**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 711:**

22 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
23 COMMUNICATION dated December 22, 2005 (control numbered GGL005313-
24 005334) did not display any ADULT IMAGES.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 711**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 712:**

13 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
14 COMMUNICATION dated December 22, 2005 (control numbered GGL005313-
15 005334) did not display any PERFECT 10 IMAGES.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 712**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 713:**

4 Admit that Norman Zada's COMMUNICATION dated February 13, 2006
5 (control numbered GGL006345-006382) did not IDENTIFY the ALLEGED
6 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
7 COMMUNICATION.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 713**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 716:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES displayed at the URLS listed in Norman Zada's
25 COMMUNICATION dated February 13, 2006 (control numbered GGL006345-
26 006382).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 716**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 717:**

15 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
16 COMMUNICATION dated February 13, 2006 (control numbered GGL006345-
17 006382) did not display any IMAGES.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 717**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 718:**

6 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
7 COMMUNICATION dated February 13, 2006 (control numbered GGL006345-
8 006382) did not display any ADULT IMAGES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 718**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 719:**

24 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
25 COMMUNICATION dated February 13, 2006 (control numbered GGL006345-
26 006382) did not display any PERFECT 10 IMAGES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 719**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion; that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 720:**

15 Admit that Norman Zada's COMMUNICATION dated March 20, 2007 was
16 addressed to GOOGLE'S Board of Directors, not GOOGLE'S designated agent for
17 accepting DMCA complaints.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 720**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 721:**

6 Admit that Norman Zada's COMMUNICATION dated March 20, 2007 did not
7 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 721**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 723:**

23 Admit that Folder 1 on the disk provided with Norman Zada's
24 COMMUNICATION dated March 20, 2007 contains at least 66 pages of ALLEGED
25 INFRINGING MATERIAL.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 723**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 724:**

15 Admit that Folder 2 on the disk provided with Norman Zada's
16 COMMUNICATION dated March 20, 2007 contains 11 subfolders comprising at
17 least 1072 pages of what YOU claim are examples "of Google ads appearing next to
18 celebrity images without permission of either the celebrity or the copyright holder."

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 724**

20 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google's choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 725:**

7 Admit that Folder 2 on the disk provided with Norman Zada's
8 COMMUNICATION dated March 20, 2007 does not contain ALLEGED
9 INFRINGING MATERIAL.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 725**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 726:**

25 Admit that PERFECT 10 does not own the rights of publicity of the celebrities
26 whose IMAGES are displayed in the electronic files in Folder 2 on the disk provided
27 with Norman Zada's COMMUNICATION dated March 20, 2007.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 726**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 727:**

16 Admit that PERFECT 10 does not own or hold an exclusive license to the
17 copyrights of the IMAGES displayed in the electronic files in Folder 2 on the disk
18 provided with Norman Zada’s COMMUNICATION dated March 20, 2007.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 727**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 728:**

7 Admit that Folder 3 on the disk provided with Norman Zada's
8 COMMUNICATION dated March 20, 2007 contains 6 subfolders comprising at least
9 2,752 pages of ALLEGED INFRINGING MATERIAL.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 728**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 729:**

25 Admit that Folder 3 on the disk provided with Norman Zada's
26 COMMUNICATION dated March 20, 2007 contains a subfolder comprising at least

1 609 pages of ALLEGED INFRINGING MATERIAL YOU claim is displayed at
2 giganews.com.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 729**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 730:**

18 Admit that Folder 3 on the disk provided with Norman Zada's
19 COMMUNICATION dated March 20, 2007 contains a subfolder comprising at least
20 509 pages of ALLEGED INFRINGING MATERIAL YOU claim is displayed at
21 newsdemon.com.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 730-**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 731:**

10 Admit that Folder 3 on the disk provided with Norman Zada's
11 COMMUNICATION dated March 20, 2007 contains a subfolder comprising at least
12 482 pages of ALLEGED INFRINGING MATERIAL YOU claim is displayed at
13 powerusernet.com.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 731**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 732:**

2 Admit that Folder 3 on the disk provided with Norman Zada's
3 COMMUNICATION dated March 20, 2007 contains a subfolder comprising at least
4 371 pages of ALLEGED INFRINGING MATERIAL YOU claim is displayed at
5 thundernews.com.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 732**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 733:**

21 Admit that Folder 3 on the disk provided with Norman Zada's
22 COMMUNICATION dated March 20, 2007 contains a subfolder comprising at least
23 596 pages of ALLEGED INFRINGING MATERIAL YOU claim is displayed at
24 usenext.com.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 733**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 734:**

13 Admit that one or more of the IMAGES in Folder 3 on the disk provided with
14 Norman Zada's COMMUNICATION dated March 20, 2007 does not display a
15 PERFECT 10 copyright notice.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 734**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 735:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES displayed at newsdemon.com.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 735**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 736:**

21 Admit that PERFECT 10 does not own or hold an exclusive license to the
22 copyrights to all of the IMAGES displayed at powerusernet.com.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 736**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 737:**

11 Admit that PERFECT 10 does not own or hold an exclusive license to the
12 copyrights to all of the IMAGES displayed at usenext.com.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 737**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that-it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 738:**

1 Admit that Folder 4 on the disk provided with Norman Zada's
2 COMMUNICATION dated March 20, 2007 contains at least 216 pages of what YOU
3 claim are "print screens of pirated songs and movies that are offered by" GOOGLE.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 738**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 739:**

19 Admit that Folder 4 on the disk provided with Norman Zada's
20 COMMUNICATION dated March 20, 2007 does not contain ALLEGED
21 INFRINGING MATERIAL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 739**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 740:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights of the songs, TV shows, and movies whose infringement is allegedly
12 depicted in Folder 4 on the disk provided with Norman Zada's COMMUNICATION
13 dated March 20, 2007.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 740**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 741:**

2 Admit that Folder 5 on the disk provided with Norman Zada's
3 COMMUNICATION dated March 20, 2007 does not contain ALLEGED
4 INFRINGING MATERIAL.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 741**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 742:**

20 Admit that Folder 6 on the disk provided with Norman Zada's
21 COMMUNICATION dated March 20, 2007 contains at least 48 pages of what YOU
22 claim are "examples of Google ads next to defamatory images of celebrities."

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 742**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 743:**

11 Admit that Folder 6 on the disk provided with Norman Zada's
12 COMMUNICATION dated March 20, 2007 does not contain ALLEGED
13 INFRINGING MATERIAL.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 743**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 1_0 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 744:**

2 Admit that PERFECT 10 does not own the rights of publicity of the celebrities
3 whose IMAGES are displayed in the electronic files in Folder 6 on the disk provided
4 with Norman Zada's COMMUNICATION dated March 20, 2007..

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 744**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 745:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights of the IMAGES displayed in the electronic files in Folder 6 on the disk
22 provided with Norman Zada's COMMUNICATION dated March 20, 2007.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 745**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 746:**

11 Admit that Norman Zada's COMMUNICATION dated April 24, 2007 (control
12 numbered GGL032075-032096) did not IDENTIFY the ALLEGED
13 COPYRIGHTED MATERIAL claimed to be infringed at each URL listed in that
14 COMMUNICATION.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 746**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the -720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 748:**

4 Admit that for at least 306 of the 318 URLs listed in Norman Zada's
5 COMMUNICATION dated April 24, 2007 (control numbered GGL032075-032096),
6 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
7 YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 748**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 750:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
25 Zada's COMMUNICATION dated April 24, 2007 (control numbered GGL032075-
26 032096).

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 750**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 751:**

15 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
16 COMMUNICATION dated April 24, 2007 (control numbered GGL032075-032096),
17 did not display any IMAGES.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 751**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 752:**

6 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
7 COMMUNICATION dated April 24, 2007 (control numbered GGL032075-032096),
8 did not display any ADULT IMAGES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 752**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 753:**

24 Admit that one or more of the INFRINGING URLS listed in Norman Zada's
25 COMMUNICATION dated April 24, 2007 (control numbered GGL032075-032096)
26 did not display any PERFECT 10 IMAGES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 753**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 754:**

15 Admit that Norman Zada's COMMUNICATION dated June 28, 2007 did not
16 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
17 each USENET SITE listed in that COMMUNICATION.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 754**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 755:**

6 Admit that Norman Zada's COMMUNICATION dated June 28, 2007 was
7 accompanied by a hard drive which YOU claim "contains approximately 1,100,000
8 infringements of Perfect 10 copyrighted images that are offered by infringing
9 websites from which Google accepts advertising and/or to which Google links."

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 755**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 756:**

25 Admit that for at least 59 of the 60 USENET SITES listed in Norman Zada's
26 COMMUNICATION dated June 28, 2007, YOU identified the "P10" subfolder

1 within the respective USENET SITE'S folder on the hard drive provided with that
2 COMMUNICATION as the ALLEGED INFRINGING MATERIAL.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 756**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 757:**

18 Admit that the hard drive provided with Norman Zada's COMMUNICATION
19 dated June 28, 2007, contains a separate "P10" subfolder for at least 59 of the 60
20 USENET SITES listed in that COMMUNICATION.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 757**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 758:**

9 Admit that for one or more of the USENET SITES listed in Norman Zada's
10 COMMUNICATION dated June 28, 2007, the "P10" subfolder within the respective
11 USENET SITE'S folder on the hard drive provided with that COMMUNICATION
12 contains MULTIPLE IMAGES.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 758**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 759:**

1 Admit that for one or more of the USENET SITES listed in Norman Zada's
2 COMMUNICATION dated June 28, 2007, the "P10" subfolder within the respective
3 USENET SITE'S folder on the hard drive provided with that COMMUNICATION
4 contains over 3 gigabytes of ALLEGED INFRINGING MATERIAL.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 759**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO: 760:**

20 Admit that for one or more of the USENET SITES listed in Norman Zada's
21 COMMUNICATION dated June 28, 2007, the "P10" subfolder within the respective
22 USENET SITE'S folder on the hard drive provided with that COMMUNICATION
23 contains over 16,000 electronic files of ALLEGED INFRINGING MATERIAL.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 760**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to farther respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 761:**

12 Admit that for one or more of the USENET SITES listed in Norman Zada's
13 COMMUNICATION dated June 28, 2007, the "P10" subfolder within the respective
14 USENET SITE'S folder on the hard drive provided with that COMMUNICATION
15 contains IMAGES that do not display a PERFECT 10 copyright notice.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 761**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 762:**

4 Admit that for one or more of the USENET SITES listed in Norman Zada's
5 COMMUNICATION dated June 28, 2007, the respective USENET SITE'S folder on
6 the hard drive provided with that COMMUNICATION contains MULTIPLE
7 subfolders (other than the "P10" subfolder) containing IMAGES that do not display
8 PERFECT 10 copyright notices.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 762**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 763:**

24 Admit that YOU did not use GOOGLE'S search engine to locate the alleged
25 infringing IMAGES YOU claim to have downloaded from the USENET SITES listed
26 in YOUR COMMUNICATIONS.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 763**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 764:**

15 Admit that YOU logged into the USENET SITES listed in YOUR
16 COMMUNICATIONS in order to locate the alleged infringing IMAGES YOU claim
17 to have downloaded from them.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 764**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 765:**

6 Admit that YOU located the alleged infringing IMAGES YOU claim to have
7 downloaded from the USENET SITES listed in YOUR COMMUNICATIONS by
8 subscribing to those websites and running searches on them.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 765**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 766:**

24 Admit that the alleged infringing IMAGES YOU claim to have downloaded
25 from the USENET SITES do not appear in GOOGLE'S search results.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 766**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 767:**

15 Admit that YOU want GOOGLE to prevent all links to the USENET SITES
16 YOU identified in YOUR COMMUNICATIONS from appearing in GOOGLE'S
17 search results.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 767**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 768:**

6 Admit that YOU want GOOGLE to remove the USENET SITES listed in
7 YOUR COMMUNICATIONS from GOOGLE'S search index.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 768**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 769:**

23 Admit that GOOGLE does not provide web page URL or IMAGE URL links
24 to access the alleged infringing IMAGES YOU claim to have downloaded from the
25 USENET SITES listed in YOUR COMMUNICATIONS.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 769**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on.
2 the grounds that they are obviously unduly burdensome and propounded to harass,
3 and distract Perfect 10 from litigating important issues in the case. Perfect 10 already
4 has expended a great deal of time and effort to respond to the 241 previous requests
5 for admissions in Google's First Set of Requests for Admissions. In addition, Perfect
6 10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 770:**

15 Admit that links to the alleged infringing IMAGES YOU claim to have
16 downloaded from the USENET SITES listed in YOUR COMMUNICATIONS do not
17 appear in GOOGLE'S search results.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 770**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 771:**

6 Admit that for the alleged infringing IMAGES YOU claim to have downloaded
7 from the USENET SITES, YOUR COMMUNICATIONS did not provide the
8 IMAGE URL or web page URL at which each of the ALLEGED INFRINGING
9 MATERIALS could be found.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 771**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 772:**

25 Admit that the alleged infringing IMAGES YOU claim to have downloaded
26 from the USENET SITES listed in YOUR COMMUNICATIONS cannot be located
27 by IMAGE URL or web page URL.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 772**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 773:**

16 Admit that the alleged infringing IMAGES YOU claim to have downloaded
17 from the USENET SITES listed in YOUR COMMUNICATIONS can be found only
18 by joining the USENET SITES in question, following the instructions for
19 downloading IMAGES from those USENET SITES, and doing searches on model
20 names or terms involving “P10.”

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 773**

22 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 774:**

9 Admit that YOU have not asked GOOGLE to remove from its search results
10 any web page URL or IMAGE URL links to the alleged infringing IMAGES YOU
11 claim to have downloaded from the USENET SITES listed in YOUR
12 COMMUNICATIONS.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 774**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 775:**

1 Admit that one or more of the IMAGES contained on the hard drive provided
2 with Norman Zada's COMMUNICATION dated June 28, 2007 displays a Playboy
3 copyright notice.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 775**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 776:**

19 Admit that one or more of the IMAGES contained on the hard drive provided
20 with Norman Zada's COMMUNICATION dated June 28, 2007 displays a Hegre-
21 Art.com copyright notice.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 776**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 777:**

10 Admit that one or more of the IMAGES contained on the hard drive provided
11 with Norman Zada's COMMUNICATION dated June 28, 2007 displays a
12 MacAndBumble.com copyright notice.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 777**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 778:**

1 Admit that the “ALL ARE P10” subfolder in the “z other infringing websites”
2 folder on the hard drive provided with Norman Zada’s COMMUNICATION dated
3 June 28, 2007 contains 37 subfolders comprising at least 385 pages of ALLEGED
4 INFRINGING MATERIAL.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 778**

6 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 779:**

20 Admit that the “ALL LARGE ARE P10” subfolder in the “z other infringing
21 websites” folder on the hard drive provided with Norman Zada’s
22 COMMUNICATION dated June 28, 2007 contains 107 subfolders comprising at
23 least 24,870 pages of ALLEGED INFRINGING MATERIAL.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 779**

25 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 780:**

12 Admit that the "ALL LARGE WITH P10 NOTICES" subfolder in the "z other
13 infringing websites" folder on the hard drive provided with Norman Zada's
14 COMMUNICATION dated June 28, 2007 contains 3 subfolders comprising at least
15 20,932 pages of ALLEGED INFRINGING MATERIAL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 780**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests, Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 781:**

4 Admit that the “z perfect 10 web site” folder on the hard drive provided with
5 Norman Zada’s COMMUNICATION dated June 28, 2007 contains “all of the
6 images, available as of June 2007 on Perfect 10’s website, perfect10.com.”

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 781**

8 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 782:**

22 Admit that the “z perfect 10 web site” folder on the hard drive provided with
23 Norman Zada’s COMMUNICATION dated June 28, 2007 contains 367 subfolders
24 comprising at least 15,121 pages of ALLEGED COPYRIGHTED MATERIAL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 782**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 783:**

13 Admit that the "z print screens" folder on the hard drive provided with Norman
14 Zada's COMMUNICATION dated June 28, 2007 does not contain any ALLEGED
15 INFRINGING MATERIAL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 783**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 784:**

4 Admit that the “z disclaimers” folder on the hard drive provided with Norman
5 Zada’s COMMUNICATION dated June 28, 2007 does not contain any ALLEGED
6 INFRINGING MATERIAL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 784**

8 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 785:**

22 Admit that the “z unfair competition” folder on the hard drive provided with
23 Norman Zada’s COMMUNICATION dated June 28, 2007 does not contain any
24 ALLEGED INFRINGING MATERIAL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 785**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 786:**

13 Admit that for at least 35 of the 146 URLs listed in Norman Zada's
14 COMMUNICATION dated June 28, 2007, YOU identified the subfolder "ALL ARE
15 P10" within the "z other infringing websites" folder on the hard drive provided with
16 that COMMUNICATION as the ALLEGED INFRINGING MATERIAL displayed at
17 each of those URLs.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 786**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 787:**

6 Admit that for at least 108 of the 146 URLs listed in Norman Zada's
7 COMMUNICATION dated June 28, 2007, YOU identified the subfolder "ALL
8 LARGE ARE P10" within the "z other infringing websites" folder on the hard drive
9 provided with that COMMUNICATION as the ALLEGED INFRINGING
10 MATERIAL displayed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 787**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 788:**

26 Admit that PERFECT 10 does not own or hold an exclusive license to the
27 copyrights to all of the IMAGES in the subfolder "ALL LARGE ARE P10" within

1 the “z other infringing websites” folder on the hard drive provided with Norman
2 Zada’s COMMUNICATION dated June 28, 2007.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 788**

4 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 789:**

18 Admit that for one or more of the URLs listed in Norman Zada’s
19 COMMUNICATION dated June 28, 2007, YOU identified the subfolder “ALL
20 LARGE WITH P10 NOTICES” within the “z other infringing websites” folder on the
21 hard drive provided with that COMMUNICATION as the ALLEGED INFRINGING
22 MATERIAL displayed at each of those URLs.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 789**

24 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree, to further respond to
4 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 790:**

11 Admit that PERFECT 10 does not own or hold an exclusive license to the
12 copyrights to all of the IMAGES in the subfolder “ALL LARGE WITH P10
13 NOTICES” within the “z other infringing websites” folder on the hard drive provided
14 with Norman Zada’s COMMUNICATION dated June 28, 2007.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 790**

16 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the. Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 791:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES on the USENET SITES listed in Norman Zada's
6 COMMUNICATION dated June 28, 2007.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 791**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 792:**

22 Admit that PERFECT 10 does not own or hold an exclusive license to the
23 copyrights to all of the IMAGES displayed at the URLs listed in Norman Zada's
24 COMMUNICATION dated June 28, 2007.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 792**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 793:**

13 Admit that Norman Zada's COMMUNICATION dated July 2, 2007 did not
14 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
15 each URL listed in that COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 793**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 795:**

4 Admit that links to one or more of the IMAGES contained on the DVDs
5 provided with Norman Zada's COMMUNICATION dated July 2, 2007 do not appear
6 in GOOGLE'S search results.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 795**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 796:**

22 Admit that links to at least 25% of the IMAGES contained on the DVDs
23 provided with Norman Zada's COMMUNICATION dated July 2, 2007 do not appear
24 in GOOGLE'S search results.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 796**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 797:**

13 Admit that links to at least 50% of the IMAGES contained on the DVDs
14 provided with Norman Zada's COMMUNICATION dated July 2, 2007 do not appear
15 in GOOGLE'S search results.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 797**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 798:**

4 Admit that one or more of the IMAGES contained on the DVDs provided with
5 Norman Zada's COMMUNICATION dated July 2, 2007 cannot be located by
6 IMAGE URL or web page URL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 798**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 799:**

22 Admit that at least 25% of the IMAGES contained on the DVDs provided with
23 Norman Zada's COMMUNICATION dated July 2, 2007 cannot be located by
24 IMAGE URL or web page URL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 799**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 800:**

13 Admit that at least 50% of the IMAGES contained on the DVDs provided with
14 Norman Zada's COMMUNICATION dated July 2, 2007 cannot be located by
15 IMAGE URL or web page URL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 800**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 801:**

4 Admit that the “ALL LARGE ARE P10” folder on Disk I provided with
5 Norman Zada’s COMMUNICATION dated July 2, 2007 contains 167 subfolders
6 comprising at least 9,046 pages of ALLEGED INFRINGING MATERIAL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 801**

8 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 802:**

22 Admit that the “ALL LARGE ARE P10” folder on Disk 1 provided with
23 Norman Zada’s COMMUNICATION dated July 2, 2007 contains 2.72 gigabytes of
24 electronic files.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 802**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 803:**

13 Admit that the "ALL ARE P10" folder on Disk I provided with Norman Zada's
14 COMMUNICATION dated July 2, 2007 contains 58 subfolders comprising at least
15 252 pages of ALLEGED INFRINGING MATERIAL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 803**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant

3 **REQUEST FOR ADMISSION NO. 804:**

4 Admit that the “ALL LARGE WITH P10 NOTICES” folder on Disk I
5 provided with Norman Zada’s COMMUNICATION dated July 2, 2007 contains 4
6 subfolders comprising at least 3,681 pages of ALLEGED INFRINGING
7 MATERIAL.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 804**

9 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 805:**

23 Admit that for at least 166 of the 246 URLs listed in Norman Zada’s
24 COMMUNICATION dated July 2, 2007, YOU identified the “ALL LARGE ARE
25 P10” folder on Disk I provided with that COMMUNICATION as the ALLEGED
26 INFRINGING MATERIAL displayed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 805**

1 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 806:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES in the “ALL LARGE ARE P10” folder on Disk I
17 provided with Norman Zada’s COMMUNICATION dated July 2, 2007.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 806**

19 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 807:**

6 Admit that for at least 59 of the 246 URLs listed in Norman Zada's
7 COMMUNICATION dated July 2, 2007, YOU identified the "ALL ARE P10" folder
8 on Disk I provided with that COMMUNICATION as the ALLEGED INFRINGING
9 MATERIAL displayed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 807**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 808:**

25 Admit that for one or more of the URLs listed in Norman Zada's
26 COMMUNICATION dated July 2, 2007, YOU identified the "ALL LARGE WITH

1 P10 NOTICES” folder on Disk I provided with that COMMUNICATION as the
2 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 808**

4 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 809:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES in the “ALL LARGE WITH P10 NOTICES” folder
20 on Disk I provided with Norman Zada’s COMMUNICATION dated July 2, 2007.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 809**

22 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the. Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 810:**

9 Admit that the “DOWNLOADS — ALL ARE P10” folder on Disk II provided
10 with Norman Zada’s COMMUNICATION dated July 2, 2007 contains 9 subfolders
11 comprising at least 34 pages of ALLEGED INFRINGING MATERIAL.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 810**

13 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 811:**

1 Admit that the “DOWNLOADS — ALL LARGE ARE P10” folder on Disk II
2 provided with Norman Zada’s COMMUNICATION dated July 2, 2007 contains 39
3 subfolders comprising at least 1,184 pages of ALLEGED INFRINGING
4 MATERIAL.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 811**

6 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 812:**

20 Admit that the “MODEL — ALL LARGE ARE P10” folder on Disk II
21 provided with Norman Zada’s COMMUNICATION dated July 2, 2007 contains 31
22 subfolders comprising at least 12,086 pages of ALLEGED INFRINGING
23 MATERIAL.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 812**

25 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 813:**

12 Admit that for one or more of the 246 URLs listed in Norman Zada's
13 COMMUNICATION dated July 2, 2007, YOU identified the "DOWNLOADS - ALL
14 ARE P10" folder on Disk II provided with that COMMUNICATION as the
15 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 813**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 814:**

4 Admit that for at least 15 of the 246 URLs listed in Norman Zada's
5 COMMUNICATION dated July 2, 2007, YOU identified the "DOWNLOADS - ALL
6 LARGE ARE P10" folder on Disk II provided with that COMMUNICATION as the
7 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 814**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 815:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES in the "DOWNLOADS - ALL LARGE ARE P10"
25 folder on Disk II provided with Norman Zada's COMMUNICATION dated July 2,
26 2007.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 815**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 816:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
17 Zada's COMMUNICATION dated July 2, 2007.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 816**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 817:**

6 Admit that Norman Zada's COMMUNICATION dated July 12, 2007 did not
7 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
8 each URL listed in that COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 817**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 819:**

24 Admit that links to one or more of the IMAGES contained on the DVD
25 provided with Norman Zada's COMMUNICATION dated July 12, 2007 do not
26 appear in GOOGLE'S search results.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 819**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 820:**

15 Admit that links to at least 25% of the IMAGES contained on the DVD
16 provided with Norman Zada's COMMUNICATION dated July 12, 2007 do not
17 appear in GOOGLE'S search results.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 820**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 821:**

6 Admit that links to at least 50% of the IMAGES contained on the DVD
7 provided with Norman Zada's COMMUNICATION dated July 12, 2007 do not
8 appear in GOOGLE'S search results.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 821**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 822:**

24 Admit that one or more of the IMAGES contained on the DVD provided with
25 Norman Zada's COMMUNICATION dated July 12, 2007 cannot be located by
26 IMAGE URL or web page URL.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 822**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, or the
2 grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests. for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to ea request for admission to the
12 extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 823:**

15 Admit that at least 25% of the IMAGES contained on the DVD provided with
16 Norman Zada's COMMUNICATION dated July 12, 2007 cannot be located by
17 IMAGE URL or web page URL.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 823**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 824:**

6 Admit that at least 50% of the IMAGES contained on the DVD provided with
7 Norman Zada's COMMUNICATION dated July 12, 2007 cannot be located by
8 IMAGE URL or web page URL.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 824**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass
12 and distract Perfect 10 from litigating important issues in the case. Perfect 10
13 already has expended a great deal of time and effort to respond to the 241 previous
14 requests for admissions in Google's First Set of Requests for Admissions. In
15 addition, Perfect 10 has admitted or denied approximately 231 of the 720 requests in
16 the Second Set of Requests for Admissions. Accordingly, Perfect 10 will agree to
17 further respond to only 100 more of these requests, of Google's choice, but not to all
18 720 of them, if Google will agree to so limit its requests. Perfect 10 is unable to
19 admit or deny all of these 720 requests, including this one, on the grounds that it
20 would take an inordinate amount of time to do so. Perfect 10 further objects to each
21 request for admission to the extent it calls for a legal conclusion, that it is vague and
22 ambiguous, unclear or unintelligible, unduly burdensome, unanswerable, and/or
23 irrelevant.

24 **REQUEST FOR ADMISSION NO. 825:**

25 Admit that the "ALL LARGE ARE P10" folder on the DVD provided with
26 Norman Zada's COMMUNICATION dated July 12, 2007 contains 206 subfolders
27 comprising at least 9,125 pages of ALLEGED INFRINGING MATERIAL.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 825**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 826:**

16 Admit that the “ALL ARE P10” folder on the DVD provided with Norman
17 Zada’s COMMUNICATION dated July 12, 2007 contains 33 subfolders comprising
18 at least 347 pages of ALLEGED INFRINGING MATERIAL.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 826**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 827:**

7 Admit that the “CHECKED ARE P10” folder on the DVD provided with
8 Norman Zada’s COMMUNICATION dated July 12, 2007 contains 3 subfolders
9 comprising at least 78 pages of ALLEGED INFRINGING MATERIAL.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 827**

11 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 828:**

25 Admit that for at least 150 of the 174 URLs listed in Norman Zada’s
26 COMMUNICATION dated July 12, 2007, YOU identified the folder “ALL LARGE

1 ARE P10” on the DVD provided with that COMMUNICATION as the ALLEGED
2 INFRINGING MATERIAL displayed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 828**

4 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 829:**

18 Admit that PERFECT 10 does not own or hold an exclusive license to the
19 copyrights to all of the IMAGES in the “ALL LARGE ARE P10” folder on the DVD
20 provided with Norman Zada’s COMMUNICATION dated July 12, 2007.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 829:**

22 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 830:**

9 Admit that for at least 20 of the 174 URLs listed in Norman Zada's
10 COMMUNICATION dated July 12, 2007, YOU identified the "ALL ARE P10"
11 folder on the DVD provided with that COMMUNICATION as the ALLEGED
12 INFRINGING MATERIAL displayed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 830**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 831:**

1 Admit that for one or more of the URLs listed in Norman Zada's
2 COMMUNICATION dated July 12, 2007, YOU identified the "CHECKED ARE
3 P10" folder on the DVD provided with that COMMUNICATION as the ALLEGED
4 INFRINGING MATERIAL displayed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 831**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further-objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 832:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights to all of the IMAGES in the "CHECKED ARE P10" folder on the DVD
22 provided with Norman Zada's July 12, 2007 COMMUNICATION.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 832**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass
26 and, distract Perfect 10 from litigating important issues in the case. Perfect 10
27 already has expended a great deal of time and effort to respond to the 241 previous

1 requests for admissions in Google's First Set of Requests for Admissions. In
2 addition, Perfect 10 has admitted or denied approximately 231 of the 720 requests in
3 the Second Set of Requests for Admissions. Accordingly, Perfect 10 will agree to
4 further respond to only 100 more of these requests, of Google's choice, but not to all
5 720 of them, if Google will agree to so limit its requests. Perfect 10 is unable to
6 admit or deny all of these 720 requests, including this one, on the grounds that it
7 would take an inordinate amount of time to do so. Perfect 10 further objects to each
8 request for admission to the extent it calls for a legal conclusion, that it is vague and
9 ambiguous, unclear or unintelligible, unduly burdensome, unanswerable, and/or
10 irrelevant.

11 **REQUEST FOR ADMISSION NO. 833:**

12 Admit that PERFECT 10 does not own or hold an exclusive license to the
13 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
14 Zada's COMMUNICATION dated July 12, 2007.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 833**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 834:**

4 Admit that Norman Zada's COMMUNICATION dated July 31, 2007 did not
5 IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be infringed at
6 each URL listed in that COMMUNICATION.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 834**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 836:**

22 Admit that links to one or more of the IMAGES contained on the DVD
23 provided with Norman Zada's COMMUNICATION dated July 31, 2007 do not
24 appear in GOOGLE'S search results.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 836**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 837:**

13 Admit that links to at least 25% of the IMAGES contained on the DVD
14 provided with Norman Zada's COMMUNICATION dated July 31, 2007 do not
15 appear in GOOGLE'S search results.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 837**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 838:**

4 Admit that links to at least 50% of the IMAGES contained on the DVD
5 provided with Norman Zada's COMMUNICATION dated July 31, 2007 do not
6 appear in GOOGLE'S search results.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 838**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 839:**

22 Admit that one or more of the IMAGES contained on the DVD provided with
23 Norman Zada's COMMUNICATION dated July 31, 2007 cannot be located by
24 IMAGE URL or web page URL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 839**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 840:**

13 Admit that at least 25% of the IMAGES contained on the DVD provided with
14 Norman Zada's COMMUNICATION dated July 31, 2007 cannot be located by
15 IMAGE URL or web page URL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 840**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 841:**

4 Admit that at least 50% of the IMAGES contained on the DVD provided with
5 Norman Zada's COMMUNICATION dated July 31, 2007 cannot be located by
6 IMAGE URL or web page URL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 841**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 842:**

22 Admit that the "ALL ARE P10" folder on the DVD provided with Norman
23 Zada's COMMUNICATION dated July 31, 2007 contains 38 subfolders comprising
24 at least 782 pages of ALLEGED INFRINGING MATERIAL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 842**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 843:**

13 Admit that the "ALL LARGE ARE P10" folder on the DVD provided with
14 Norman Zada's COMMUNICATION dated July 31, 2007 contains 97 subfolders
15 comprising at least 8,358 pages of ALLEGED INFRINGING MATERIAL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 843**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 844:**

4 Admit that the “ALL LARGE WITH P10 NOTICES” folder on the DVD
5 provided with Norman Zada’s COMMUNICATION dated July 31, 2007 contains 3
6 subfolders comprising at least 3,269 pages of ALLEGED INFRINGING
7 MATERIAL.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 844**

9 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 845:**

23 Admit that the “CHECKED ARE P10” folder on the DVD provided with
24 Norman Zada’s COMMUNICATION dated July 31, 2007 contains 53 subfolders
25 comprising at least 1,691 pages of ALLEGED INFRINGING MATERIAL.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 845**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 846:**

15 Admit that the "DISPLAY ALL ARE P10" folder on the DVD provided with
16 Norman Zada's COMMUNICATION dated July 31, 2007 contains 5 subfolders
17 comprising at least 730 pages of ALLEGED INFRINGING MATERIAL.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 846**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 847:**

6 Admit that the “DISPLAY ALL LARGE ARE P10” folder on the DVD
7 provided with Norman Zada’s COMMUNICATION dated July 31, 2007 contains 4
8 subfolders comprising at least 358 pages of ALLEGED INFRINGING MATERIAL.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 847**

10 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly, burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 848:**

24 Admit that the “MODEL SEARCH ALL LARGE ARE P10” folder on the
25 DVD provided with Norman Zada’s COMMUNICATION dated July 31, 2007
26 contains 3 subfolders comprising at least 1,439 pages of ALLEGED INFRINGING
27 MATERIAL.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 848**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 849:**

16 Admit that for at least 73 of the 140 URLs listed in Norman Zada’s
17 COMMUNICATION dated July 31, 2007, YOU identified the “ALL LARGE ARE
18 P10” folder on the DVD provided with that COMMUNICATION as the ALLEGED
19 INFRINGING MATERIAL displayed at each of those URLs.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 849**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 850:**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES in the “ALL LARGE ARE P10” folder on the DVD
10 provided with Norman Zada’s COMMUNICATION dated July 31, 2007.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 850**

12 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 851:**

26 Admit that for at least 30 of the 140 URLS listed in Norman Zada’s
27 COMMUNICATION dated July 31, 2007, YOU identified the “ALL ARE P10”

1 folder on the DVD provided with that COMMUNICATION as the ALLEGED
2 INFRINGING MATERIAL displayed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 851**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 852:**

18 Admit that for at least 35 of the 140 URLs listed in Norman Zada's
19 COMMUNICATION dated July 31, 2007, YOU identified the "CHECKED ARE
20 P10" folder on the DVD provided with that COMMUNICATION as the ALLEGED
21 INFRINGING MATERIAL displayed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 852**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and-ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 853:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES in the "CHECKED ARE P10" folder on the DVD
12 provided with Norman Zada's COMMUNICATION dated July 31, 2007.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 853**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 854:**

1 Admit that for one or more of the URLs listed in Norman Zada's
2 COMMUNICATION dated July 31, 2007, YOU identified the "DISPLAY ALL ARE
3 P10" folder on the DVD provided with that COMMUNICATION as the ALLEGED
4 INFRINGING MATERIAL displayed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 854**

6 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
7 the grounds that they are obviously unduly burdensome and propounded to harass and
8 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
9 expended a great deal of time and effort to respond to the 241 previous requests for
10 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
11 has admitted or denied approximately 231 of the 720 requests in the Second Set of
12 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
13 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
14 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
15 these 720 requests, including this one, on the grounds that it would take an inordinate
16 amount of time to do so. Perfect 10 further objects to each request for admission to
17 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
18 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

19 **REQUEST FOR ADMISSION NO. 855:**

20 Admit that PERFECT 10 does not own or hold an exclusive license to the
21 copyrights to all of the IMAGES in the "DISPLAY ALL ARE P10" folder on the
22 DVD provided with Norman Zada's COMMUNICATION dated July 31, 2007.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 855**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 856:**

11 Admit that for one or more of the URLs listed in Norman Zada’s
12 COMMUNICATION dated July 31, 2007, YOU identified the “DISPLAY ALL
13 LARGE ARE P10” folder on the DVD provided with that COMMUNICATION as
14 the ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 856**

16 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 857:**

4 Admit that PERFECT 10 does not own or hold an exclusive license to the
5 copyrights to all of the IMAGES in the “DISPLAY ALL LARGE ARE P10” folder
6 on the DVD provided with Norman Zada’s COMMUNICATION dated July 31,
7 2007.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 857**

9 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 858:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
25 Zada’s COMMUNICATION dated July 31, 2007.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 858**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 859:**

15 Admit that Norman Zada's COMMUNICATION dated October 16, 2007 did
16 not IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be
17 infringed at each URL listed in that COMMUNICATION.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 859**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 861:**

6 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
7 October 16, 2007 contains 16,940 IMAGES YOU claim to have downloaded from
8 giganews.com.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 861**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 862:**

24 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
25 October 16, 2007 contains 852 IMAGES YOU claim to have downloaded from
26 rapidshare.com.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 862**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 863:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES on DVD 1 provided with Norman Zada's
17 COMMUNICATION dated October 16, 2007.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 863**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 864:**

6 Admit that PERFECT 10 does not own or hold an exclusive license to the
7 copyrights to all of the IMAGES displayed on giganews.com.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 864**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on-the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 865:**

23 Admit that PERFECT 10 does not own or hold an exclusive license to the
24 copyrights to all of the IMAGES displayed on rapidshare.com.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 865**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 866:**

13 Admit that links to one or more of the IMAGES contained on DVD 2 provided
14 with Norman Zada's COMMUNICATION dated October 16, 2007 do not appear in
15 GOOGLE'S search results.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 866**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 867:**

4 Admit that links to at least 25% of the IMAGES contained on DVD 2 provided
5 with Norman Zada's COMMUNICATION dated October 16, 2007 do not appear in
6 GOOGLE'S search results.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 867**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 868:**

22 Admit that links to at least 50% of the IMAGES contained on DVD 2 provided
23 with Norman Zada's COMMUNICATION dated October 16, 2007 do not appear in
24 GOOGLE'S search results.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 868**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 869:**

13 Admit that one or more of the IMAGES contained on DVD 2 provided with
14 Norman Zada's COMMUNICATION dated October 16, 2007 cannot be located by
15 IMAGE URL or web page URL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 869**

17 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 870:**

4 Admit that at least 25% of the IMAGES contained on DVD 2 provided with
5 Norman Zada's COMMUNICATION dated October 16, 2007 cannot be located by
6 IMAGE URL or web page URL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 870**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important-issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 871:**

22 Admit that at least 50% of the IMAGES contained on DVD 2 provided with
23 Norman Zada's COMMUNICATION dated October 16, 2007 cannot be located by
24 IMAGE URL or web page URL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 871**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 872:**

13 Admit that the “ALL LARGE ARE P10” folder on DVD 2 provided with
14 Norman Zada’s COMMUNICATION dated October 16, 2007 contains 88 subfolders
15 comprising at least 2,884 pages of ALLEGED INFRINGING MATERIAL.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 872**

17 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
18 the grounds that they are obviously unduly burdensome and propounded to harass and
19 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
20 expended a great deal of time and effort to respond to the 241 previous requests for
21 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
22 has admitted or denied approximately 231 of the 720 requests in the Second Set of
23 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
24 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
25 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
26 these 720 requests, including this one, on the grounds that it would take an inordinate
27 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 873:**

4 Admit that the “ALL ARE P10” folder on DVD 2 provided with Norman
5 Zada’s COMMUNICATION dated October 16, 2007 contains 79 subfolders
6 comprising at least 4,978 pages of ALLEGED INFRINGING MATERIAL.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 873**

8 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google’s choice, but not to all 720 of them if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 874:**

22 Admit that the “CHECKED ARE P10” folder on DVD 2 provided with
23 Norman Zada’s COMMUNICATION dated October 16, 2007 contains 35 subfolders
24 comprising at least 436 pages of ALLEGED INFRINGING MATERIAL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 874**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 875:**

13 Admit that the “ALL ARE P10” subfolder within the “MODELS” folder on
14 DVD 2 provided with Norman Zada’s COMMUNICATION dated October 16, 2007
15 contains 13 subfolders comprising at least 10,466 pages of ALLEGED INFRINGING
16 MATERIAL.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 875**

18 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 876:**

5 Admit that the “ALL LARGE ARE P10” subfolder within the “MODELS”
6 folder on DVD 2 provided with Norman Zada’s COMMUNICATION dated October
7 16, 2007 contains 2 subfolders comprising at least 1,698 pages of ALLEGED
8 INFRINGING MATERIAL.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 876**

10 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each -request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 877:**

24 Admit that the “CHECKED ARE P10” subfolder within the “MODELS” folder
25 on DVD 2 provided with Norman Zada’s COMMUNICATION dated October 16,
26 2007 contains a subfolder comprising at least 276 pages of ALLEGED INFRINGING
27 MATERIAL.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 877**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 878:**

16 Admit that for at least 80 of the 195 URLs listed in Norman Zada’s
17 COMMUNICATION dated October 16, 2007, YOU identified the “ALL LARGE
18 ARE P10” folder on DVD 2 provided with that COMMUNICATION as the
19 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 878**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 879:**

8 Admit that PERFECT 10 does not own or hold an exclusive license to the
9 copyrights to all of the IMAGES in the "ALL LARGE ARE P10" folder on DVD 2
10 provided with Norman Zada's COMMUNICATION dated October 16, 2007.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 879**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 880:**

26 Admit that for at least 78 of the 195 URLs listed in Norman Zada's
27 COMMUNICATION dated October 16, 2007, YOU identified the "ALL ARE P10"

1 folder on DVD 2 provided with that COMMUNICATION as the ALLEGED
2 INFRINGING MATERIAL displayed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 880**

4 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 881:**

18 Admit that for at least 35 of the 195 URLs listed in Norman Zada's
19 COMMUNICATION dated October 16, 2007, YOU identified the "CHECKED ARE
20 P10" folder on DVD 2 provided with that COMMUNICATION as the ALLEGED
21 INFRINGING MATERIAL displayed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 881**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 882:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES in the "CHECKED ARE P10" folder on DVD 2
12 provided with Norman Zada's COMMUNICATION dated October 16, 2007.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 882**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 883:**

1 Admit that PERFECT 10 does not own or hold an exclusive license to the
2 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
3 Zada's COMMUNICATION dated October 16, 2007.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 883**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 884:**

19 Admit that Norman Zada's COMMUNICATION dated December 13, 2007 did
20 not IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be
21 infringed at each URL listed in that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 884**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 886:**

10 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
11 December 13, 2007 contains 15,623 IMAGES YOU claim to have downloaded from
12 thundernews.com.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 886**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 887:**

1 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
2 December 13, 2007 contains 1900 IMAGES YOU claim to have downloaded from
3 rapidshare.com.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 887**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 888:**

19 Admit that PERFECT 10 does not own or hold an exclusive license to the
20 copyrights to all of the IMAGES on DVD 1 provided with Norman Zada's
21 COMMUNICATION dated December 13, 2007.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 888**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 889:**

10 Admit that PERFECT 10 does not own or hold an exclusive license to the
11 copyrights to all of the IMAGES displayed on thundernews.com.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 889**

13 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
14 the grounds that they are obviously unduly burdensome and propounded to harass and
15 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
16 expended a great deal of time and effort to respond to the 241 previous requests for
17 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
18 has admitted or denied approximately 231 of the 720 requests in the Second Set of
19 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
20 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
21 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
22 these 720 requests, including this one, on the grounds that it would take an inordinate
23 amount of time to do so. Perfect 10 further objects to each request for admission to
24 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
25 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

26 **REQUEST FOR ADMISSION NO. 890:**

1 Admit that links to one or more of the IMAGES contained on DVD 2 provided
2 with Norman Zada's COMMUNICATION dated December 13, 2007 do not appear
3 in GOOGLE'S search results.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 890**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 891:**

19 Admit that links to at least 25% of the IMAGES contained on DVD 2 provided
20 with Norman Zada's COMMUNICATION dated December 13, 2007 do not appear
21 in GOOGLE'S search results.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 891**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect JO will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 892:**

10 Admit that links to at least 50% of the IMAGES contained on DVD 2 provided
11 with Norman Zada's COMMUNICATION dated December 13, 2007 do not appear
12 in GOOGLE'S search results.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 892**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 893:**

1 Admit that one or more of the IMAGES contained on DVD 2 provided with
2 Norman Zada's COMMUNICATION dated December 13, 2007 cannot be located by
3 IMAGE URL or web page URL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 893**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 894:**

19 Admit that at least 25% of the IMAGES contained on DVD 2 provided with
20 Norman Zada's COMMUNICATION dated December 13, 2007 cannot be located by
21 IMAGE URL or web page URL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 894**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

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28

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 895:**

10 Admit that at least 50% of the IMAGES contained on DVD 2 provided with
11 Norman Zada's COMMUNICATION dated December 13, 2007 cannot be located by
12 IMAGE URL or web page URL.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 895**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 896:**

1 Admit that the “ALL ARE P10” folder on DVD 2 provided with Norman
2 Zada’s COMMUNICATION dated December 13, 2007 contains 80 subfolders
3 comprising at least 8,772 pages of ALLEGED INFRINGING MATERIAL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 896**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass’
7 and distract Perfect 10 from litigating important issues in the case. Perfect 10 already
8 has expended a great deal of time and effort to respond to the 241 previous requests
9 for admissions in Google’s First Set of Requests for Admissions. In addition, Perfect
10 10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 897:**

19 Admit that the “CHECKED ARE P10” folder on DVD 2 provided with
20 Norman Zada’s COMMUNICATION dated December 13, 2007 contains 36
21 subfolders comprising at least 712 pages of ALLEGED INFRINGING MATERIAL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 897**

23 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 898:**

10 Admit that the "CHECKED OR LARGE ARE P10" folder on DVD 2 provided
11 with Norman Zada's COMMUNICATION dated December 13, 2007 contains 19
12 subfolders comprising at least 1,027 pages of ALLEGED INFRINGING
13 MATERIAL.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 898**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 899:**

2 Admit that the “ALL ARE P10” subfolder within the “MODELS” folder on
3 DVD 2 provided with Norman Zada’s COMMUNICATION dated December 13,
4 2007 contains 18 subfolders comprising at least 16,276 pages of ALLEGED
5 INFRINGING MATERIAL.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 899**

7 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 900:**

21 Admit that the “CHECKED OR LARGE ARE P10” subfolder within the
22 “MODELS” folder on DVD 2 provided with Norman Zada’s COMMUNICATION
23 dated December 13, 2007 contains 4 subfolders comprising at least 1,885 pages of
24 ALLEGED INFRINGING MATERIAL.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 900**

26 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 901:**

13 Admit that for at least 36 of the 141 URLs listed in Norman Zada's
14 COMMUNICATION dated December 13, 2007, YOU identified the "CHECKED
15 ARE P10" folder on DVD 2 provided with that COMMUNICATION as the
16 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 901**

18 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 902:**

5 Admit that for at least 80 of the 141 URLs listed in Norman Zada's
6 COMMUNICATION dated December 13, 2007, YOU identified the "ALL ARE
7 P10" folder on DVD 2 provided with that COMMUNICATION as the ALLEGED
8 INFRINGING MATERIAL displayed at each of those URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 902**

10 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
11 the grounds that they are obviously unduly burdensome and propounded to harass and
12 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
13 expended a great deal of time and effort to respond to the 241 previous requests for
14 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
15 has admitted or denied approximately 231 of the 720 requests in the Second Set of
16 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
17 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
18 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
19 these 720 requests, including this one, on the grounds that it would take an inordinate
20 amount of time to do so. Perfect 10 further objects to each request for admission to
21 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
22 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

23 **REQUEST FOR ADMISSION NO. 903:**

24 Admit that for at least 23 of the 141 URLs listed in Norman Zada's
25 COMMUNICATION dated December 13, 2007, YOU identified the "CHECKED
26 OR LARGE ARE P10" folder on DVD 2 provided with that COMMUNICATION as
27 the ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 903**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous , requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 904:**

16 Admit that PERFECT 10 does not own or hold an exclusive license to the
17 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
18 Zada’s COMMUNICATION dated December 13, 2007.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 904**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

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1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 905:**

7 Admit that Norman Zada's COMMUNICATION dated January 24, 2008 did
8 not IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be
9 infringed at each URL listed in that COMMUNICATION.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 905**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 907:**

25 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
26 January 24, 2008 contains what YOU claim are "2,546 infringing Perfect 10

1 copyrighted images downloaded...from the infringing websites megaerotic.com and
2 rapidshare.com.”

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 907**

4 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
5 the grounds that they are obviously unduly burdensome and propounded to harass and
6 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
7 expended a great deal of time and effort to respond to the 241 previous requests for
8 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
9 has admitted or denied approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
11 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
12 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
13 these 720 requests, including this one, on the grounds that it would take an inordinate
14 amount of time to do so. Perfect 10 further objects to each request for admission to
15 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
16 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

17 **REQUEST FOR ADMISSION NO. 908:**

18 Admit that PERFECT 10 does not own the copyrights to all of the IMAGES
19 displayed on megaerotic.com.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 908**

21 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
22 the grounds that they are obviously unduly burdensome and propounded to harass and
23 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
24 expended a great deal of time and effort to respond to the 241 previous requests for
25 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
26 has admitted or denied approximately 231 of the 720 requests in the Second Set of
27 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to

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1 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
2 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
3 these 720 requests, including this one, on the grounds that it would take an inordinate
4 amount of time to do so. Perfect 10 further objects to each request for admission to
5 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
6 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

7 **REQUEST FOR ADMISSION NO. 909:**

8 Admit that links to one or more of the IMAGES contained on DVD 2 provided
9 with Norman Zada's COMMUNICATION dated January 24, 2008 do not appear in
10 GOOGLE'S search results.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 909**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 910:**

26

27

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28

1 Admit that links to at least 25% of the IMAGES contained on DVD 2 provided
2 with Norman Zada's COMMUNICATION dated January 24, 2008 do not appear in
3 GOOGLE'S search results.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 910**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 911:**

19 Admit that links to at least 50% of the IMAGES contained on DVD 2 provided
20 with Norman Zada's COMMUNICATION dated January 24, 2008 do not appear in
21 GOOGLE'S search results.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 911**

23 Perfect 10 objects to Google's Requests for Admissions Nos.' 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this One, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 912:**

10 Admit that one or more of the IMAGES contained on DVD 2 provided with
11 Norman Zada's COMMUNICATION dated January 24, 2008 cannot be located by
12 IMAGE URL or web page URL.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 912**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 913:**

1 Admit that at least 25% of the IMAGES contained on DVD 2 provided with
2 Norman Zada's COMMUNICATION dated January 24, 2008 cannot be located by
3 IMAGE URL or web page URL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 913**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 914:**

19 Admit that at least 50% of the IMAGES contained on DVD 2 provided with
20 Norman Zada's COMMUNICATION dated January 24, 2008 cannot be located by
21 IMAGE URL or web page URL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 914**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 915:**

10 Admit that the "ALL ARE P10" folder on DVD 2 provided with Norman
11 Zada's COMMUNICATION dated January 24, 2008 contains 33 subfolders
12 comprising at least 13,588 pages of ALLEGED INFRINGING MATERIAL.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 915**

14 Perfect 10 objects to Google's Requests for Admission Nos. 242 to 962, on the
15 grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 916:**

1 Admit that the “ALL ARE P10” folder on DVD 2 provided with Norman
2 Zada’s COMMUNICATION dated January 24, 2008 contains 1.79 gigabytes of
3 electronic files.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 916**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 917:**

19 Admit that the “CHECKED OR LARGE ARE P10” folder on DVD 2 provided
20 with Norman Zada’s COMMUNICATION dated January 24, 2008 contains 32
21 subfolders comprising at least 1,220 pages of ALLEGED INFRINGING
22 MATERIAL.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 917**

24 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 918:**

11 Admit that the "ALL ARE P10" subfolder within the "MODEL SEARCHES"
12 folder on DVD 2 provided with Norman Zada's COMMUNICATION dated
13 January 24, 2008 contains 9 subfolders comprising at least 5,255 pages of ALLEGED
14 INFRINGING MATERIAL.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 918**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 919:**

4 Admit that the “CHECKED OR LARGE ARE P10” subfolder within the
5 “MODEL SEARCHES” folder on DVD 2 provided with Norman Zada’s
6 COMMUNICATION dated January 24, 2008 contains 5 subfolders comprising at
7 least 1,384 pages of ALLEGED INFRINGING MATERIAL.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 919**

9 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 920:**

23 Admit that for at least 33 of the 67 URLs listed in Norman Zada’s
24 COMMUNICATION dated January 24, 2008, YOU identified the “CHECKED OR
25 LARGE ARE P10” folder on DVD 2 provided with that COMMUNICATION as the
26 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 920**

1 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 921:**

15 Admit that PERFECT 10 does not own or hold an exclusive license to the
16 copyrights to all of the IMAGES in the “CHECKED OR LARGE ARE P10” folder
17 on DVD 2 provided with Norman Zada’s COMMUNICATION dated January 24,
18 2008.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 921**

20 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
21 the grounds that they are obviously unduly burdensome and propounded to harass and
22 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
23 expended a great deal of time and effort to respond to the 241 previous requests for
24 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
25 has admitted or denied approximately 231 of the 720 requests in the Second Set of
26 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
27 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if

1 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
2 these 720 requests, including this one, on the grounds that it would take an inordinate
3 amount of time to do so. Perfect 10 further objects to each request for admission to
4 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
5 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

6 **REQUEST FOR ADMISSION NO. 922:**

7 Admit that for at least 32 of the 67 URLs listed in Norman Zada's
8 COMMUNICATION dated January 24, 2008, YOU identified the "ALL ARE P10"
9 folder on DVD 2 provided with that COMMUNICATION as the ALLEGED
10 INFRINGING MATERIAL displayed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 922**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 923:**

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51320/2624735.751320/262

4735.751320/2624735

28

1 Admit that PERFECT 10 does not own or hold an exclusive license to the
2 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
3 Zada's COMMUNICATION dated January 24, 2008.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 923**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 924:**

19 Admit that Norman Zada's COMMUNICATION dated March 17, 2008, did
20 not IDENTIFY the ALLEGED COPYRIGHTED MATERIAL claimed to be
21 infringed at each URL listed in that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 924**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 926:**

10 Admit that DVD 1 provided with Norman Zada's COMMUNICATION dated
11 March 17, 2008, contains what YOU claim are "5,343 infringing Perfect 10
12 copyrighted images downloaded . . . from the infringing websites depositfiles.com,
13 easy-share.com, rapidshare.com, and rhinonewsgroups.com."

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 926**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 927:**

2 Admit that PERFECT 10 does not own the copyrights to all of the IMAGES
3 displayed at depositfiles.com.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 927**

5 Perfect 10 objects to Google's Requests for Admissions Nos., 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 928:**

19 Admit that PERFECT 10 does not own the copyrights to all of the IMAGES
20 displayed at easy-share.com.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 928**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 929:**

9 Admit that PERFECT 10 does not own the copyrights to all of the IMAGES
10 displayed at rhinonewsgroups.com.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 929**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 930:**

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28

1 Admit that links to one or more of the IMAGES contained on DVD 2 provided
2 with Norman Zada's COMMUNICATION dated March 17, 2008 do not appear in
3 GOOGLE'S search results.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 930**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests,-of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 931:**

19 Admit that links to at least 25% of the IMAGES contained on DVD 2 provided
20 with Norman Zada's COMMUNICATION dated March 17, 2008 do not appear in
21 GOOGLE'S search results.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 931**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 932:**

10 Admit that links to at least 50% of the IMAGES contained on DVD 2 provided
11 with Norman Zada's COMMUNICATION dated March 17, 2008 do not appear in
12 GOOGLE'S search results.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 932**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 933:**

1 Admit that one or more of the IMAGES contained on DVD 2 provided with
2 Norman Zada's COMMUNICATION dated March 17, 2008 cannot be located by
3 IMAGE URL or web page URL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 933**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 934:**

19 Admit that at least 25% of the IMAGES contained on DVD 2 provided with
20 Norman Zada's COMMUNICATION dated March 17, 2008 cannot be located by
21 IMAGE URL or web page URL.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 934**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 935:**

10 Admit that at least 50% of the IMAGES contained on DVD 2 provided with
11 Norman Zada's COMMUNICATION dated March 17, 2008 cannot be located by
12 IMAGE URL or web page URL.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 935**

14 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
15 the grounds that they are obviously unduly burdensome and propounded to harass and
16 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
17 expended a great deal of time and effort to respond to the 241 previous requests for
18 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
19 has admitted or denied approximately 231 of the 720 requests in the Second Set of
20 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
21 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
22 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
23 these 720 requests, including this one, on the grounds that it would take an inordinate
24 amount of time to do so. Perfect 10 further objects to each request for admission to
25 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
26 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

27 **REQUEST FOR ADMISSION NO. 936:**

1 Admit that the “ALL ARE P10” folder on DVD 2 provided with Norman
2 Zada’s COMMUNICATION dated March 17, 2008 contains 41 subfolders
3 comprising at least 11,114 pages of ALLEGED INFRINGING MATERIAL.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 936:**

5 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 937:**

19 Admit that the “CHECKED OR LARGE ARE P10” folder on DVD 2 provided
20 with Norman Zada’s COMMUNICATION dated March 17, 2008 contains 16
21 subfolders comprising at least 1,118 pages of ALLEGED INFRINGING
22 MATERIAL.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 937**

24 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10 **REQUEST FOR ADMISSION NO. 938:**

11 Admit that the “ALL ARE P10” subfolder within the “MODELS” folder on
12 DVD 2 provided with Norman Zada’s COMMUNICATION dated March 17, 2008
13 contains 19 subfolders comprising at least 12,656 pages of ALLEGED INFRINGING
14 MATERIAL.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 938**

16 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 939:**

4 Admit that the “CHECKED OR LARGE ARE P10” subfolder within the
5 “MODELS” folder on DVD 2 provided with Norman Zada’s COMMUNICATION
6 dated March 17, 2008 contains 3 subfolders comprising at least 1,242 pages of
7 ALLEGED INFRINGING MATERIAL.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 939**

9 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 940:**

23 Admit that for at least 41 of the 62 URLs listed in Norman Zada’s
24 COMMUNICATION dated March 17, 2008, YOU identified the “ALL ARE P10”
25 folder on DVD 2 provided with that COMMUNICATION as the ALLEGED
26 INFRINGING MATERIAL displayed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 940**

1 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
2 the grounds that they are obviously unduly burdensome and propounded to harass and
3 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
4 expended a great deal of time and effort to respond to the 241 previous requests for
5 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
6 has admitted or denied approximately 231 of the 720 requests in the Second Set of
7 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
8 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
9 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
10 these 720 requests, including this one, on the grounds that it would take an inordinate
11 amount of time to do so. Perfect 10 further objects to each request for admission to
12 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
13 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

14 **REQUEST FOR ADMISSION NO. 941:**

15 Admit that the "ALL ARE P10" folder on DVD 2 provided with Norman
16 Zada's COMMUNICATION dated March 17, 2008 contains 1.23 gigabytes of
17 electronic files.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 941**

19 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 942:**

6 Admit that for at least 17 of the 62 URLs listed in Norman Zada's
7 COMMUNICATION dated March 17, 2008, YOU identified the "CHECKED OR
8 LARGE ARE P10" folder on DVD 2 provided with that COMMUNICATION as the
9 ALLEGED INFRINGING MATERIAL displayed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 942**

11 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
12 the grounds that they are obviously unduly burdensome and propounded to harass and
13 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
14 expended a great deal of time and effort to respond to the 241 previous requests for
15 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
16 has admitted or denied approximately 231 of the 720 requests in the Second Set of
17 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
18 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
19 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
20 these 720 requests, including this one, on the grounds that it would take an inordinate
21 amount of time to do so. Perfect 10 further objects to each request for admission to
22 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
23 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

24 **REQUEST FOR ADMISSION NO. 943:**

25 Admit that PERFECT 10 does not own or hold an exclusive license to the
26 copyrights to all of the IMAGES allegedly displayed at the URLs listed in Norman
27 Zada's COMMUNICATION dated March 17, 2008.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 943**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so.-Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 944:**

16 Admit that a password is necessary to access portions of amyweber.net.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 944**

18 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
19 the grounds that they are obviously unduly burdensome and propounded to harass and
20 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
21 expended a great deal of time and effort to respond to the 241 previous requests for
22 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
23 has admitted or denied approximately 231 of the 720 requests in the Second Set of
24 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
25 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
26 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
27 these 720 requests, including this one, on the grounds that it would take an inordinate

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1 amount of time to do so. Perfect 10 further objects to each request for admission to
2 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
3 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

4 **REQUEST FOR ADMISSION NO. 945:**

5 Admit that YOU have never provided GOOGLE with a password to
6 amyweber.net.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 945**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on .
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 946:**

22 Admit that PERFECT 10 does not own or hold an exclusive license to the
23 copyright to the website amyweber.net.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 946**

25 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
26 the grounds that they are obviously unduly burdensome and propounded to harass and
27 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has

1 expended a great deal of time and effort to respond to the 241 previous requests for
2 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
3 has admitted or denied approximately 231 of the 720 requests in the Second Set of
4 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
5 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
6 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
7 these 720 requests, including this one, on the grounds that it would take an inordinate
8 amount of time to do so. Perfect 10 further objects to each request for admission to
9 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
10 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

11 **REQUEST FOR ADMISSION NO. 947:**

12 Admit that PERFECT 10 has not registered the copyright to the website
13 amyweber.net.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 947**

15 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
16 the grounds that they are obviously unduly burdensome and propounded to harass and
17 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
18 expended a great deal of time and effort to respond to the 241 previous requests for
19 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
20 has admitted or denied approximately 231 of the 720 requests in the Second Set of
21 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
22 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
23 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
24 these 720 requests, including this one, on the grounds that it would take an inordinate
25 amount of time to do so. Perfect 10 further objects to each request for admission to
26 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
27 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

1 **REQUEST FOR ADMISSION NO. 948:**

2 Admit that PERFECT 10 does not own or hold an exclusive license to the
3 copyrights to all of the IMAGES displayed on amyweber.net.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 948**

5 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
6 the grounds that they are obviously unduly burdensome and propounded to harass and
7 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
8 expended a great deal of time and effort to respond to the 241 previous requests for
9 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
10 has admitted or denied approximately 231 of the 720 requests in the Second Set of
11 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
12 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
13 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
14 these 720 requests, including this one, on the grounds that it would take an inordinate
15 amount of time to do so. Perfect 10 further objects to each request for admission to
16 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
17 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

18 **REQUEST FOR ADMISSION NO. 949:**

19 Admit that PERFECT 10 is not authorized to act on behalf of the owner of the
20 copyright to amyweber.net.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 949**

22 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
23 the grounds that they are obviously unduly burdensome and propounded to harass and
24 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
25 expended a great deal of time and effort to respond to the 241 previous requests for
26 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
27 has admitted or denied approximately 231 of the 720 requests in the Second Set of

1 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
2 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
3 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
4 these 720 requests, including this one, on the grounds that it would take an inordinate
5 amount of time to do so. Perfect 10 further objects to each request for admission to
6 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
7 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

8 **REQUEST FOR ADMISSION NO. 950:**

9 Admit that the copyright to amyweber.net was never assigned or transferred in
10 writing to PERFECT 10.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 950**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 951:**

26 Admit that PERFECT 10 does not own or hold an exclusive license to the
27 copyright to ambersmith.net.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 951**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 952:**

16 Admit that PERFECT 10 has not registered the copyright to the website
17 ambersmith.net.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 952**

19 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests in the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 953:**

6 Admit that PERFECT 10 does not own or hold an exclusive license to the
7 copyrights to all of the IMAGES displayed on ambersmith.net.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 953**

9 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
10 the grounds that they are obviously unduly burdensome and propounded to harass and
11 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
12 expended a great deal of time and effort to respond to the 241 previous requests for
13 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
14 has admitted or denied approximately 231 of the 720 requests in the Second Set of
15 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
16 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
17 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
18 these 720 requests, including this one, on the grounds that it would take an inordinate
19 amount of time to do so. Perfect 10 further objects to each request for admission to
20 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
21 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

22 **REQUEST FOR ADMISSION NO. 954:**

23 Admit that PERFECT 10 is not authorized to act on behalf of the owner of the
24 copyright to ambersmith.net.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 954**

26 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
27 the grounds that they are obviously unduly burdensome and propounded to harass and

1 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
2 expended a great deal of time and effort to respond to the 241 previous requests for
3 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
4 has admitted or denied approximately 231 of the 720 requests in the Second Set of
5 Requests for Admissions. Accordingly, Perfect 10 will agree' to further respond to
6 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
7 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
8 these 720 requests, including this one, on the grounds that it would take an inordinate
9 amount of time to do so. Perfect 10 further objects to each request for admission to
10 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
11 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

12 **REQUEST FOR ADMISSION NO. 955:**

13 Admit that the copyright to ambersmith.net was never assigned or transferred
14 in writing to PERFECT 10.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 955**

16 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
17 the grounds that they are obviously unduly burdensome and propounded to harass and
18 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
19 expended a great deal of time and effort to respond to the 241 previous requests for
20 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
21 has admitted or denied approximately 231 of the 720 requests in the Second Set of
22 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
23 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
24 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
25 these 720 requests, including this one, on the grounds that it would take an inordinate
26 amount of time to do so. Perfect 10 further objects to each request for admission to

1 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
2 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

3 **REQUEST FOR ADMISSION NO. 956:**

4 Admit that more than one thousand IMAGES are currently displayed at
5 perfect10.com.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 956**

7 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
8 the grounds that they are obviously unduly burdensome and propounded to harass and
9 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
10 expended a great deal of time and effort to respond to the 241 previous requests for
11 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
12 has admitted or denied approximately 231 of the 720 requests in the Second Set of
13 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
14 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
15 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
16 these 720 requests, including this one, on the grounds that it would take an inordinate
17 amount of time to do so. Perfect 10 further objects to each request for admission to
18 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
19 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

20 **REQUEST FOR ADMISSION NO. 957:**

21 Admit that more than 2,500 IMAGES are currently displayed at perfect10.com.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 957**

23 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
24 the grounds that they are obviously unduly burdensome and propounded to harass and
25 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
26 expended a great deal of time and effort to respond to the 241 previous requests for
27 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10

1 has admitted or denied approximately 231 of the 720 requests in the Second Set of
2 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
3 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
4 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
5 these 720 requests, including this one, on the grounds that it would take an inordinate
6 amount of time to do so. Perfect 10 further objects to each request for admission to
7 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
8 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

9 **REQUEST FOR ADMISSION NO. 958:**

10 Admit that more than 5,000 IMAGES are currently displayed at perfect10.com.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 958**

12 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
13 the grounds that they are obviously unduly burdensome and propounded to harass and
14 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
15 expended a great deal of time and effort to respond to the 241 previous requests for
16 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
17 has admitted or denied approximately 231 of the 720 requests in the Second Set of
18 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
19 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
20 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
21 these 720 requests, including this one, on the grounds that it would take an inordinate
22 amount of time to do so. Perfect 10 further objects to each request for admission to
23 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
24 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

25 **REQUEST FOR ADMISSION NO. 959:**

26 Admit that more than 200 IMAGES were displayed at ambersmith.net at the
27 time YOU sent YOUR first COMMUNICATION referencing ambersmith.net.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 959**

2 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
3 the grounds that they are obviously unduly burdensome and propounded to harass and
4 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
5 expended a great deal of time and effort to respond to the 241 previous requests for
6 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
7 has admitted or denied approximately 231 of the 720 requests in the Second Set of
8 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
9 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
10 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
11 these 720 requests, including this one, on the grounds that it would take an inordinate
12 amount of time to do so. Perfect 10 further objects to each request for admission to
13 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
14 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

15 **REQUEST FOR ADMISSION NO. 960:**

16 Admit that more than 1000 IMAGES were displayed at ambersmith.net at the
17 time YOU sent YOUR first COMMUNICATION referencing ambersmith.net.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 960**

19 Perfect 10 objects to Google’s Requests for Admissions Nos. 242 to 962, on
20 the grounds that they are obviously unduly burdensome and propounded to harass and
21 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
22 expended a great deal of time and effort to respond to the 241 previous requests for
23 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
24 has admitted or denied approximately 231 of the 720 requests it the Second Set of
25 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
26 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
27 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of

1 these 720 requests, including this one, on the grounds that it would take an inordinate
2 amount of time to do so. Perfect 10 further objects to each request for admission to
3 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
4 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

5 **REQUEST FOR ADMISSION NO. 961:**

6 Admit that more than 200 IMAGES are currently displayed at amyweber.net.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 961**

8 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
9 the grounds that they are obviously unduly burdensome and propounded to harass and
10 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
11 expended a great deal of time and effort to respond to the 241 previous requests for
12 admissions in Google's First Set of Requests for Admissions. In addition, Perfect 10
13 has admitted or denied approximately 231 of the 720 requests in the Second Set of
14 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
15 only 100 more of these requests, of Google's choice, but not to all 720 of them, if
16 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
17 these 720 requests, including this one, on the grounds that it would take an inordinate
18 amount of time to do so. Perfect 10 further objects to each request for admission to
19 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
20 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

21 **REQUEST FOR ADMISSION NO. 962:**

22 Admit that more than 1000 IMAGES are currently displayed at amyweber.net.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 962**

24 Perfect 10 objects to Google's Requests for Admissions Nos. 242 to 962, on
25 the grounds that they are obviously unduly burdensome and propounded to harass and
26 distract Perfect 10 from litigating important issues in the case. Perfect 10 already has
27 expended a great deal of time and effort to respond to the 241 previous requests for

1 admissions in Google’s First Set of Requests for Admissions. In addition, Perfect 10
2 has admitted or denied approximately 231 of the 720 requests in the Second Set of
3 Requests for Admissions. Accordingly, Perfect 10 will agree to further respond to
4 only 100 more of these requests, of Google’s choice, but not to all 720 of them, if
5 Google will agree to so limit its requests. Perfect 10 is unable to admit or deny all of
6 these 720 requests, including this one, on the grounds that it would take an inordinate
7 amount of time to do so. Perfect 10 further objects to each request for admission to
8 the extent it calls for a legal conclusion, that it is vague and ambiguous, unclear or
9 unintelligible, unduly burdensome, unanswerable, and/or irrelevant.

10
11 **B. GOOGLE’S POSITION :**

12 Each of the 478 Requests set forth above, for which Perfect 10 failed to
13 provide any substantive response, seek legally significant information about Perfect
14 10’s 72 purported DMCA notices. They seek admissions as to the contents of Perfect
15 10’s DMCA-related communications to Google—specifically, what copyrighted
16 works were identified, if any, in Perfect 10’s communications, whether the
17 communications satisfy the requirements of the DMCA, and how Perfect 10 claims
18 the notices identified the alleged infringements (if they did). The issues covered by
19 these Requests are critical to Google's DMCA safe harbor defense, which Google
20 intends to move for summary judgment on, and are squarely within Perfect 10's
21 knowledge. Perfect 10 has no basis for not answering them.

22 **1. Perfect 10 Has Improperly Failed to Provide Any Substantive**
23 **Response to 478 Requests.**

24 Rather than answer these 478 Requests, or specify why it could not
25 respond to the requests as worded (if that were the case), Perfect 10 instead cut and
26 pasted the same boilerplate colloquy and objections to each one, as follows:

1 Perfect 10 objects to Google’s Requests for Admissions
2 Nos. 242 to 962, on the grounds that they are obviously
3 unduly burdensome and propounded to harass and distract
4 Perfect 10 from litigating important issues in the case.
5 Perfect 10 already has expended a great deal of time and
6 effort to respond to the 241 previous requests for
7 admissions in Google’s First Set of Requests for
8 Admissions. In addition, Perfect 10 has admitted or denied
9 approximately 231 of the 720 requests in the Second Set of
10 Requests for Admissions. Accordingly, Perfect 10 will
11 agree to further respond to only 100 more of these requests,
12 of Google’s choice, but not to all 720 of them, if Google
13 will agree to so limit its requests. Perfect 10 is unable to
14 admit or deny all of these 720 requests, including this one,
15 on the grounds that it would take an inordinate amount of
16 time to do so. Perfect 10 further objects to each request for
17 admission to the extent it calls for a legal conclusion, that it
18 is vague and ambiguous, unclear or unintelligible, unduly
19 burdensome, unanswerable, and/or irrelevant.

20 Perfect 10’s wholesale refusal to provide an individualized response to 478 of
21 Google’s proper Requests violates the letter and spirit of Rule 36. Rule 36 provides
22 that “[i]f a matter is not admitted, the answer must specifically deny it or state in
23 detail why the answering party cannot truthfully admit or deny it.” Fed. R. Civ. P.
24 36(a)(4); see also Marchand, 22 F.3d at 938 (party has a duty to respond to requests
25 for admission and in doing so, must “admit to the fullest extent possible, and explain
26 in detail why other portions of a request may not be admitted.”)

27 Perfect 10’s boilerplate statements and objections regarding these
28 Requests do not satisfy Perfect 10’s obligations under Rule 36. Courts routinely find
29 these types of boilerplate objections insufficient. See Henry v. Champlain
30 Enterprises, Inc., 212 F.R.D. 73, 78 (N.D.N.Y. 2003) (“objections must be directed
31 and specifically related to a specific request ... [g]eneral objections without any

1 reference to a specific request to admit are meritless”). This Court should do the
2 same here.

3 Perfect 10’s boilerplate objections are also devoid of merit. For
4 example, Perfect 10 repeatedly states that Google’s requests are “obviously unduly
5 burdensome and propounded to harass and distract Perfect 10.” To the contrary, it is
6 obvious that they were not. Google is entitled to admissions regarding each and
7 every purported DMCA notice Perfect 10 claims to have sent. The volume of
8 Requests Google propounded on this subject is entirely a function of the volume of
9 alleged notices Perfect 10 sent and the scope of Perfect 10's own infringement claims.
10 Further, Perfect 10's objections that the requests are “vague and ambiguous, unclear
11 *or* unintelligible, unduly burdensome, unanswerable, *and/or* irrelevant” (emphasis
12 added) don't actually state which objections (if any) apply to a given request. Nor
13 does Perfect 10 offer any explanation or support for these cut-and-paste objections.

14 Repeating this language after each of Google’s Requests is tantamount
15 to providing no response at all, and is clearly insufficient under Rule 36. “[G]eneral
16 or boilerplate objections such as ‘overly burdensome and harassing’ are improper-
17 especially when a party fails to submit any evidentiary declarations supporting such
18 objections. ... Similarly, boilerplate relevancy objections, without setting forth any
19 explanation or argument why the requested documents are not relevant, are
20 improper.” A. Farber and Partners, Inc. v. Garber, 234 F.R.D. 186, 188 (C.D.Cal.
21 2006).

22 As for Perfect 10’s boilerplate statement that it “is unable to admit or
23 deny all of these 720 requests, including this one, on the grounds that it would take an
24 inordinate amount of time to do so,” this too is an improper objection. A party may
25 ***only*** assert that it lacks the ability to admit or deny a request if that objection is based
26 on “lack of knowledge or information” and the party was unable to ascertain the
27 necessary information through a reasonable inquiry. Fed. R. Civ. P. 36(a)(4); see

1 Asea, Inc. v. Southern Pacific Transportation Co., 669 F.2d at 1246 (“a party may not
2 give lack of information as a reason for failure to admit or deny unless he states that
3 he has made reasonable inquiry”). A party may *not* assert this statement merely on
4 the basis that responding would take a long time, as Perfect 10 has done here. See
5 Diedrich, 132 F.R.D. at 616 (holding that “the extent to which attorneys’
6 investigation of the facts is necessary or burdensome is *not* a basis for objection”
7 where the information is “reasonably available to the answering party”) (emphasis in
8 original).

9 Plainly, Perfect 10 has failed to conduct a reasonable inquiry in
10 responding to these Requests. A few examples illustrate the lack of merit in Perfect
11 10’s refusal to answer these basic requests. For instance, Google’s Request for
12 Admission No. 956 asks Perfect 10 to “[a]dmit that more than one thousand IMAGES
13 are currently displayed at perfect10.com.” Perfect 10 easily could have admitted or
14 denied this Request based on readily accessible information but, instead, responded
15 with the same boilerplate languages as it did for each of these 478 requests.
16 Similarly, Google’s Request for Admission No. 720 asks Perfect 10 to “[a]dmit that
17 Norman Zada’s COMMUNICATION dated March 20, 2007 was addressed to
18 GOOGLE’S Board of Directors, not GOOGLE’S designated agent for accepting
19 DMCA complaints.” Again, Perfect 10 refused to answer a basic question regarding
20 a purported DMCA notice that has important legal significance with respect to
21 Google’s potential liability for any copyright infringement and is highly material to
22 its anticipated motion for summary judgment. Perfect 10’s refusal to respond to basic
23 discovery requests concerning its own DMCA notices should not be sustained.

24 **2. These 478 Requests Should be Deemed Admitted.**

25 Given Perfect 10’s failure to respond to these requests, this Court should
26 deem them admitted in full. A response consisting of boilerplate objections and
27 statements of inability to admit or deny a request without detailed reasons why the

1 party cannot truthfully admit or deny the request after a reasonable inquiry may be
2 deemed an admission under Rule 36(a). See Asea, 669 F.2d. at 1245 (“an evasive
3 denial, one that does not specifically deny the matter, or a response that does not set
4 forth in detail the reasons why the answering party cannot truthfully admit or deny
5 the matter, may be deemed an admission”). In Garber, the court ordered requests
6 admitted when Garber failed to demonstrate that he made a reasonable inquiry in
7 responding to the requests and responded with only boilerplate objections and
8 “evasive and incomplete” responses. 237 F.R.D. at 267-257.

9 Here, for these 478 Requests, Perfect 10’s responses are more than
10 “evasive and incomplete”—they are substantively non-existent. In pasting the same
11 boilerplate refusal to respond to each request, Perfect 10 offered no individualized
12 reasons why it could not respond to specific requests, and offered no indication that it
13 had made any inquiry (much less a reasonable inquiry) into the matters requested.
14 These 478 Requests for Admission should be ordered admitted.

15 **3. Alternatively, Perfect 10 should be ordered to provide**
16 **substantive responses to these 478 requests without delay.**

17 In the alternative, if the Court elects to order that Perfect 10 serve
18 substantive responses to these requests rather than order the requests admitted,
19 Google asks that the order specify that Perfect 10 must make an admission or denial
20 which “fairly responds to the substance of the request,” as Rule 36 requires. These
21 requests target core issues in this case—the deficiencies in Perfect 10’s purported
22 DMCA notices, and Google’s corresponding entitlement to safe harbor under the
23 DMCA. The Court, Perfect 10, and Google will benefit from establishing which facts
24
25
26
27

1 concerning Perfect 10's purported DMCA notices that Perfect 10 purports to dispute
2 in advance of the summary judgment motion Google intends to file on this issue.¹

3 Perfect 10 should not be excused from providing substantive responses
4 to Google's Requests based on its objection to the number of requests Google has
5 served. The burden associated with Google's Requests for Admission is *not* undue.
6 Perfect 10 chose to send more than 70 alleged DMCA notices to Google, and then
7 chose to sue upon them. For each alleged DMCA notice, Google propounded only
8 approximately *nine* Requests asking for information relevant to each notice, and the
9 elements that must be shown under the DMCA for a notice to be valid. Each request
10 was directed toward discrete facts. Had Perfect 10 sent fewer notices, fewer requests
11 would have been necessary. The volume of requests Google sent is entirely a
12 function of the scope of the case Perfect 10 has elected to bring, and any associated
13 burden in answering them is *not* undue. A large number of requests corresponding to
14 important factual issues is quite appropriate in a case as complex as this one.

15 Moreover, the fact that Perfect 10 itself has served -- and Google has
16 answered -- 715 requests for admission undermines any argument of undue burden
17 that Perfect 10 would make with respect to these 478 unanswered Requests for
18 Admission.

19 Finally, during the parties' meet and confer efforts, Perfect 10 staunchly
20 refused to provide responses to these 478 Requests unless Google agreed to withdraw
21
22

23 ¹ Perfect 10 clearly *could* respond to Google's Requests for Admission with
24 information readily obtainable to it. Any attempt by Perfect 10 to amend its
25 responses and claim that, after making a reasonable inquiry, it lacks the information
26 to respond to these 478 requests would be disingenuous and unacceptable under Rule
27 36. All 478 requests concern the content of Perfect 10's *own* communications to
Google.

1 many of them. At no time did Perfect 10 provide any authority or justification for its
2 decision to completely ignore these validly propounded Requests.

3 Given (1) Perfect 10's failure to answer these 478 Requests, (2) Perfect
4 10's lack of cooperation in meet and confer efforts to address its insufficient
5 responses, (3) Perfect 10's ability to admit or deny the requests based on readily
6 accessible information, and (4) the fact that these 478 requests pose no undue burden
7 to Perfect 10 in light of the complexity and scope of its case, this Court should order
8 that these 478 Requests be deemed admitted, or alternatively, order that Perfect 10
9 fully and truthfully admit or deny each of these 478 Requests without objection.

10 **C. PERFECT 10'S POSITION :**

11 Perfect 10 incorporates its Preliminary Statement (Joint Stipulation, page 4 line
12 17 to page 7, line 16) into this Section, along with the following.

13 **1. Perfect 10 Could Not Immediately Amend Its Responses**
14 **Because Of Its Obligations In These Consolidated Cases And**
15 **Google's Strategy To Overload Perfect 10 With Make Work.**

16 At the October 6, 2008 hearing, the Court indicated a willingness to limit
17 discovery or even stay it. In response, Google has dug up every conceivable issue
18 and is rabidly filing motions to compel. Since the October 6, 2008 hearing, Google
19 has sent Perfect 10 numerous correspondence about discovery matters and has
20 demanded to meet and confer about issues it never raised prior to October 6, 2008 or
21 had long forgotten. Since the October 6, 2008 hearing, Google sent counsel for
22 Perfect 10 at least 40 letters and e-mails regarding discovery issues. (Kincaid Decl., ¶
23 3.)

24 In addition, since the October 6, 2008 hearing, Perfect 10's counsel has been
25 inundated with work. *Inter alia*, Perfect 10 (1) filed a summary judgment motion
26 against Alexa.com; (2) filed the supplemental briefing, revised statement of genuine
27

1 issues, declarations, and exhibits regarding the A9.com summary judgment motion,
2 as ordered by the Court; (3) filed supplemental briefing in the Amazon action
3 regarding the protective order sought by Amazon; (4) personally met with Andrew
4 Bridges for a full day regarding the Court's discovery plan, as ordered by the Court;
5 (5) served responses to Alexa's first set of interrogatories; (6) served responses to
6 Alexa's first set of document requests and produced documents pursuant to it; (7)
7 attended the hearing on the A9.com summary judgment motion. That's just in these
8 cases; there are other matters, including personal matters, that Perfect 10's counsel
9 has to attend to. Perfect 10's counsel informed Google's counsel that they were
10 extremely busy and could not immediately respond to its every growing list of
11 discovery immediately. That just brought on an even greater onslaught of e-mails
12 and letters demanding discovery, most of which has nothing to do with the important
13 issues in the case. (Kincaid Decl., ¶ 4.)

14 **2. Google's Tactics Are Particularly Galling Given Its Own**
15 **Delays In Amending Responses To Perfect 10's Requests For**
16 **Admission.**

17 Google itself took over seven (7) months to serve amended responses to Perfect
18 10's requests for admissions. As discussed below, those amended responses are
19 wholly deficient, but Perfect 10 has given up on trying to compel Google to do
20 anything. In contrast, Perfect 10's responses are substantive.

21 At the beginning of January 2008, Perfect 10 initiated the meet and confer
22 process regarding Google's responses to requests for admissions. Seven months
23 later, Google finally served amended responses. Ironically, on May 8, 2008 (four
24 months after Perfect 10 initiated the meet and confer process), Google's counsel
25 asked Perfect 10's to not follow-up regarding how much time Google was taking to
26

1 amend its responses to Perfect 10's requests for admissions, and Perfect 10 never
2 followed-up again.

3 On May 8, 2008, Rachel Herrick wrote:

4 "As I explained last week, we have been devoting all of our energies over the
5 past several weeks to Google's document production effort related to the
6 court's recent discovery order. This must take precedence given the court
7 order. I told you that I would follow up with you thereafter, and I will....
8 [W]e had to set aside most other projects during the past several weeks to focus
9 on the document production. We are working on the amended responses and
10 we will serve them as soon as they are complete. This is a large project and it
11 takes time. We would appreciate it if you would refrain from sending repeated
12 follow up emails asking when these amended responses are coming. It is
13 unnecessary....")

14 (Kincaid Decl., Exh. C; E-mail to Valerie Kincaid from Rachel Herrick, dated May 8,
15 2008.)

16 Three months later, on August 8, 2008, Google served deficient amended
17 responses, with numerous qualifications, and concurrently demanded that Perfect 10
18 meet and confer regarding Perfect 10's responses to requests for admissions.

19 (Kincaid Decl., ¶ 5.)

20 **3. Google's Requests Are Pointless and Abusive.**

21 Requests 244 through 343 are all requests dealing with Perfect 10 DMCA
22 notices from 2001. These requests are particularly abusive, since Google knows that
23 Perfect 10 cannot go back now to determine what was on many of those web pages as
24 they are no longer up or have changed. (This is not because of any action taken by
25 Google, but merely as a result of passage of time.) So the notices basically speak for
26 themselves. Perfect 10 is willing to answer a sampling of requests for admissions in
27

1 this area, to the best of its ability, and that should suffice, since the notices were by
2 and large, very similar, as they contain similar language and content. Google for
3 some reason claims that these notices are somehow relevant to the case. In fact, in
4 2001, a) Google waited until Perfect 10 sent it 16 notices in 2001 before claiming that
5 Google could not do anything, b) Google never suggested that there were any
6 deficiencies in Perfect 10 notices, c) despite being ordered to do so, Google has still
7 not identified the person who sent Perfect 10 the email in July of 2001 claiming that
8 Google could not do anything with respect to taking down infringing material, and d)
9 despite being ordered to do so, Google has still not produced the notices it received
10 from copyright holders in 2001 or any DMCA log relating to those notices. That
11 Perfect 10's notices were sufficient is evidenced by the fact that a) Perfect 10
12 attached actual copies of the infringed images to many of the notices, and b) Google
13 never stated that the notices were deficient or provided any instructions as to how to
14 correct them if they were deficient.

15 Many of Google's other requests basically ask Perfect 10 to go through its
16 various DMCA notices and agree or disagree with Google's characterizations of what
17 was in those notices. Once again, the notices speak for themselves, and to the extent
18 that there are justifiable reasons to seek admissions for certain aspects of certain
19 notices, that can be done with 100 requests, not multiple hundreds as proposed by
20 Google.

21 While Google complains about Perfect 10's responses, it is Google that has
22 demonstrated its disrespect for the legal system by its failure to respond to specific
23 orders of the Court. For example, not only has Google not produced a DMCA log as
24 ordered by Judge Matz, it has also produced essentially no reports relating to Judge
25 Matz's May 13, 2008 order to produce all reports, studies, or internal memoranda
26 ordered, requested or circulated by eleven Google employees and/or officers. Google
27 has also still not responded to this Court's Order dated May 22, 2006 concerning

1 Interrogatory 24. Google has also failed to respond to large numbers of requests for
2 admissions such as, for example, 654, 656, 657, 658, 659, 660, 661, 662, 663, 664,
3 665, 666, 667, 668, 669, 670, 671, and 672. (Kincaid Decl., Exh. D.) In other words,
4 for this sample, Google failed to respond to 17 out of 18 requests. Perfect 10 has
5 given up filing motions to compel – even when Google is ordered to produce
6 discovery it has not done so in many cases.

7 **4. This Court Should Limit The Number Of Requests For**
8 **Admissions And Not Order Perfect 10 To Respond To Any**
9 **Additional Requests.**

10 Perfect 10 objected to 478 Requests for Admissions on various grounds,
11 including that they were unduly burdensome and harassing because Google served
12 almost 1,000 requests for admissions. Google failed to cite a single authority where a
13 court ordered a party to respond to a large number of requests for admissions, let
14 alone almost 1,000 requests for admissions. Without citing any authority, Google
15 asserts that, *no matter how many requests for admissions are propounded*, the
16 answering party must respond.

17 Rule 26 of the Federal Rules of Civil Procedure specifically states that a court
18 may limit the number of requests for admissions. “By order or local rule, the court
19 may [also] limit the number of requests under Rule 36.” (Fed.R.Civ.Pro.
20 26(b)(2)(A).) Importantly, “Rule 26 contains the central provisions on scope of
21 discovery that control all of the particular discovery devices.” (8 Charles A. Wright
22 and Arthur R. Miller, Federal Practice & Procedure 2nd §2001 (2008); see also
23 McCloud v. Board of Geary County Commissioners, 2008 WL 3502436, *3 (D.Kan.)
24 (“...large numbers of requests for admissions may be unduly burdensome depending
25 on the facts and circumstances of the particular case. ...[L]arge numbers of requests
26 for admission may also be part of a ‘scorched earth’ discovery strategy designed to

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

2 Objection: Vague and ambiguous. Google does provide links to infringing
3 images which come from the password-protected area of perfect10.com. Perfect 10
4 lacks information and knowledge regarding what Google does and does not index;
5 Google would have that information.

6 **REQUEST FOR ADMISSION NO. 18:**

7 Admit that PERFECT 10 is aware that it can use robot exclusion headers to
8 prevent GOOGLE from indexing PERFECT 10'S WEBSITES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

10 Objection: Vague and ambiguous, also irrelevant. Admitted that PERFECT 10
11 is aware that it could use robot exclusion headers, but that would not reduce the
12 damage to Perfect 10's copyrighted works, because Google is knowingly making
13 thousands of Perfect 10's full-size images available for free to Google users.
14 Furthermore, Perfect 10 lacks information and knowledge regarding what Google
15 does when robot exclusion headers are present. The remainder of this request is
16 denied.

17 **REQUEST FOR ADMISSION NO. 19:**

18 Admit that PERFECT 10 has never used robot exclusion headers to prevent
19 GOOGLE from indexing PERFECT 10'S WEBSITES.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

21 Objection: Irrelevant. Admitted that PERFECT 10 has never used robot
22 exclusion headers because that would not reduce the damage done by Google to
23 Perfect 10's copyrighted works.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that GOOGLE's use of THUMBNAIL IMAGES serves a different
26 function than do PERFECT 10's original IMAGES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

1 Objection: Vague and ambiguous. Admitted that GOOGLE's use of other
2 people's copyrighted images serves to make money for Google rather than for the
3 rightful owner of the copyright. The remainder of this request is denied.

4 **REQUEST FOR ADMISSION NO. 36:**

5 Admit that GOOGLE does not use THUMBNAIL IMAGES for purposes of
6 artistic expression.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

8 Objection: This request is unclear. GOOGLE uses what it refers to as
9 THUMBNAIL IMAGES (which are really much larger than a person's thumbnail)
10 for purposes of infringement. Perfect 10 lacks knowledge and information sufficient
11 to enable it to further admit or deny this request; if this request is understandable, it is
12 something that Google would have information on

13 **REQUEST FOR ADMISSION NO. 37:**

14 Admit that the primary use of GOOGLE's THUMBNAIL IMAGES is not for
15 artistic expression.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

17 Objection: This request is unclear. GOOGLE uses what it refers to as
18 THUMBNAIL IMAGES (which are really much larger than a person's thumbnail)
19 for purposes of infringement. There are REDUCED SIZE IMAGES that have artistic
20 expression. Perfect 10 lacks knowledge and information sufficient to enable it to
21 further admit or deny this request; if this request is understandable, it is something
22 that Google would have information on.

23 **REQUEST FOR ADMISSION NO. 40:**

24 Admit that GOOGLE's THUMBNAIL IMAGES are used as a tool to locate .
25 information on the Internet.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

1 Objection: This request is unclear. Denied. There is no justification for using
2 images or anything else to help people locate stolen materials.

3 **REQUEST FOR ADMISSION NO. 56:**

4 Admit that GOOGLE does not control the third-party websites that PERFECT
5 10 alleges infringe its copyrights.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

7 Objection: Vague and ambiguous. GOOGLE has so much power and influence
8 on the Internet that it can effectively control most third party websites. On this basis,
9 Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 96:**

11 Admit that GOOGLE does not prevent copyright holders from collecting
12 information needed to issue DMCA notifications.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 96:**

14 GOOGLE does not make available to copyright holders all of the images that it
15 stores on its servers, and does not assist Perfect 10 in locating infringing images in its
16 indexes and databases. Furthermore, Google has obstructed discovery in this case. On
17 that basis, Perfect 10 denies the request.

18 **REQUEST FOR ADMISSION NO. 99:**

19 Admit that GOOGLE does not prevent copyright holders from providing
20 DMCA-compliant notifications.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 99:**

22 Google makes it much more difficult than necessary for copyright owners to
23 provide notices that satisfy Google's purported requirements. GOOGLE purports to
24 require things in notices that are not required by the DMCA itself. Google publishes
25 DMCA notices and infringing URLs that are the subject of those notices on
26 chillingeffects.org, thereby giving infringers the very information to locate the
27 infringing material. GOOGLE does not make available to copyright holders all of the

1 images that it stores on its servers, and does not assist Perfect 10 in locating
2 infringing images in its indexes and databases. Furthermore, Google has obstructed
3 discovery in this case. Google does not remove or disable access to infringing
4 material that it is notified about. in compliant DMCA notices, but instead comes up
5 with contrived excuses for not acting. While Google does not prevent copyright
6 holders from providing DMCA-compliant notices, Google does not act on them.
7 Perfect 10 denies the remainder of this request.

8 **REQUEST FOR ADMISSION NO. 100:**

9 Admit that GOOGLE does not prevent PERFECT 10 from providing DMCA-
10 compliant notifications.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 100:**

12 Google makes it much more difficult than necessary for copyright owners,
13 including Perfect 10, to provide notices that satisfy Google’s purported requirements.
14 GOOGLE purports to require things in notices that are not required by the DMCA
15 itself. Google publishes DMCA notices and infringing URLs that are the subject of
16 those notices on chillingeffects.org, thereby giving infringers the very information to
17 locate the infringing material. GOOGLE does not make available to Perfect 10 all of
18 the images that it stores on its servers, and does not assist Perfect 10 in locating
19 infringing images in its indexes and databases. Furthermore, Google has obstructed
20 discovery in this case. Google does not remove or disable access to infringing
21 material that it is notified about in compliant DMCA notices, but instead comes up
22 with contrived excuses for not acting. While Google does not prevent Perfect 10 from
23 providing DMCA-compliant notices, Google does not act on them. Perfect 10 denies
24 the remainder of this request.

25 **REQUEST FOR ADMISSION NO. 145:**

26 Admit that GOOGLE does not control the Internet.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 145:**

1 Objection: Vague and ambiguous. Admitted that GOOGLE does not control
2 every aspect of the Internet. However, because of its power, influence, wealth, and
3 control, and because it partners with infringing websites and in many cases provides
4 them with critical support, Google does have a great deal of control over the Internet,
5 and especially over infringing content on the Internet. GOOGLE has so much power
6 and influence on the Internet that it can effectively control most third party websites.
7 Perfect 10 denies the remainder of the request.

8 **REQUEST FOR ADMISSION NO. 147:**

9 Admit that YOUR print magazine is no longer in circulation.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 147:**

11 Denied. Perfect 10 still sells back issues of the magazine, and on that basis,
12 denies the request. Admitted that because of rampant infringement, Perfect 10 ceased
13 publishing new issues of the magazine. Perfect 10 will resume publication of new
14 issues of the magazine when it is able to.

15 **REQUEST FOR ADMISSION NO. 158:**

16 Admit that as of January 1, 2008, YOUR business relationship with FoneStarz
17 Media Limited had been cancelled.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 158:**

19 Admitted that Perfect 10 is not currently receiving any revenue from
20 FoneStarz. Perfect 10 has entered into discussions with FoneStarz about resuming its
21 relationship. On that basis, Perfect 10 denies the request. The problem, of course, is
22 that GOOGLE offers cell phone downloads of stolen Perfect 10 images for free,
23 destroying the market for authorized images that are paid for.

24 **REQUEST FOR ADMISSION NO. 166:**

25 Admit that YOU never PROFITED from licensing REDUCED SIZE IMAGES
26 for downloading to mobile phones.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 166:**

1 Objection: Vague and ambiguous. Because mobile phone downloads at one
2 time brought in extra money with no or little extra cost, Perfect 10 denies the request.
3 Perfect 10's revenues have been severely impacted by the fact that GOOGLE offers
4 cell phone downloads of stolen Perfect 10 images for free, destroying the market for
5 authorized images that are paid for.

6 **REQUEST FOR ADMISSION NO. 172:**

7 Admit that YOU have not brought suit against the PERSONS or entities other
8 than GOOGLE whom YOU believe are directly infringing YOUR copyrights, as
9 alleged in the COMPLAINT.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 172:**

11 Objection: Vague and ambiguous. Denied. Perfect 10 has brought suit. against
12 some of the PERSONS or entities other than GOOGLE which are directly infringing
13 its copyrights. However, because there are so many of these websites, and they are
14 located all over the world, GOOGLE is in a much better position to control this
15 infringement and reduce damage to the copyrighted works.

16 **REQUEST FOR ADMISSION NO. 194:**

17 Admit that YOU have no evidence that any PERSON obtained a password to
18 perfect10.com for which they did not pay by conducting a search on
19 www.google.com.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 194:**

21 Denied. Furthermore, Google has obstructed discovery on this.

22 **REQUEST FOR ADMISSION NO. 199:**

23 Admit that during the period from 2004 to 2008, more users have visited
24 perfect10.com from www.google.com than from any other website.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 199:**

26 Admitted that users visit perfect10.com from www.google.com, but many of
27 these users access perfect10.com with stolen passwords obtained from

1 www.google.com. After making reasonable inquiry, Perfect 10 lacks knowledge and
2 information sufficient to enable it to further admit or deny this request. Google may
3 have this information.

4 **REQUEST FOR ADMISSION NO. 200:**

5 Admit that YOU have used optimization techniques to increase the likelihood
6 that perfect10.com will be indexed against key words used by users of GOOGLE's
7 search engine.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 200:**

9 Objection: This request is unclear, because optimization techniques is not
10 defined. Admitted that Perfect 10 has tried to increase the traffic to its website.
11 However, because GOOGLE biases its search results to favor infringing advertising
12 affiliates, Perfect 10's efforts have not been successful. The remainder of this request
13 is denied.

14 **REQUEST FOR ADMISSION NO. 205:**

15 Admit that YOU have disabled the passwords identified in REQUEST FOR
16 ADMISSION NO. 204.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 205:**

18 Objection: Vague and ambiguous. Admitted that Perfect 10 has periodically or
19 permanently disabled most passwords that it has identified as having been used to
20 wrongfully access perfect10.com by users who did not pay for those passwords. The
21 only way to completely stop all unauthorized accesses, as long as GOOGLE and
22 others are making hundreds of perfect10.com passwords available to their users, is to
23 completely shut down perfect10.com. On that basis, Perfect 10 denies the remainder
24 of the request.

25 **REQUEST FOR ADMISSION NO. 207:**

26 Admit that YOU could disable the passwords identified in REQUEST FOR
27 ADMISSION NO. 204.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 207:**

2 As long as GOOGLE and others are giving away hundreds of passwords to
3 perfect10.com, there is no practical way that Perfect 10 knows of to avoid
4 unauthorized accesses to perfect10.com, without shutting down the website. On that
5 basis, Perfect 10 denies the request.

6 **REQUEST FOR ADMISSION NO. 209:**

7 Admit that, with respect to each IMAGE YOU contend was infringed by
8 GOOGLE, YOU cannot identify the specific-copyright registration number
9 pertaining to that IMAGE.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 209:**

11 Objection: Vague and ambiguous. Denied. However, because Google has
12 infringed so many images and has so many copies of those images in its search index,
13 it would take Perfect 10 years of work to match the registrations with each infringing
14 copy, as Google has requested.

15 **REQUEST FOR ADMISSION NO. 210:**

16 Admit that, with respect to each IMAGE YOU contend was infringed by
17 GOOGLE, YOU cannot identify a specific COMMUNICATION by which YOU
18 gave GOOGLE notice of such infringement.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 210:**

20 Objection: Vague and ambiguous. Denied. However, because Google has
21 infringed so many images and has so many copies of those images in its search index,
22 it would take Perfect 10 years of work to match the notices with each infringing copy,
23 as Google has requested.

24 **REQUEST FOR ADMISSION NO. 213:**

25 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
26 1999.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 213:**

1 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
2 10 has never had a profitable year.

3 **REQUEST FOR ADMISSION NO. 214:**

4 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
5 2000.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 214:**

7 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
8 10 has never had a profitable year.

9 **REQUEST FOR ADMISSION NO. 215:**

10 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
11 2001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 215:**

13 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
14 10 has never had a profitable year.

15 **REQUEST FOR ADMISSION NO. 216:**

16 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
17 2002.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 216:**

19 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
20 10 has never had a profitable year.

21 **REQUEST FOR ADMISSION NO. 217:**

22 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
23 2003.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 217:**

25 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
26 10 has never had a profitable year.

27 **REQUEST FOR ADMISSION NO. 218:**

1 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
2 2004.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 218:**

4 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
5 10 has never had a profitable year.

6 **REQUEST FOR ADMISSION NO. 219:**

7 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
8 2005.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 219:**

10 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
11 10 has never had a profitable year.

12 **REQUEST FOR ADMISSION NO. 220:**

13 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
14 2006.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 220: -**

16 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
17 10 has never had a profitable year.

18 **REQUEST FOR ADMISSION NO. 221:**

19 Admit that YOU did not PROFIT from publishing the Perfect 10 Magazine in
20 2007.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 221:**

22 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
23 10 has never had a profitable year.

24 **REQUEST FOR ADMISSION NO. 222:**

25 Admit that YOU never PROFITED from publishing the Perfect 10 Magazine
26 in any given fiscal year in which YOU published it.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 222:**

1 Admitted that due to massive infringement of Perfect 10's copyrights, Perfect
2 10 has never had a profitable year.

3 **REQUEST FOR ADMISSION NO. 223:**

4 Admit that YOU ceased publishing the Perfect 10 Magazine because it was not
5 a PROFITABLE business.

6 **RESPONSE TO REQUEST FOR ADMISSION NO: 223:**

7 Admitted that Perfect 10's business was not profitable because of massive
8 copyright infringement by GOOGLE and others and that Perfect 10 has ceased
9 publishing new issues of the magazine, until it is successful in the litigation. The
10 remainder of this request is denied.

11 **REQUEST FOR ADMISSION NO. 226:**

12 Admit that YOU did not PROFIT from publishing the perfect10.com website
13 in 2000.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 226:**

15 Perfect 10 has insufficient information to admit or deny the request, because
16 the costs of running Perfect 10's website have been, at times, less than the revenues
17 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
18 allocated, one could conceivably conclude that the website was profitable or
19 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
20 money each year due to massive infringement by GOOGLE and others.

21 **REQUEST FOR ADMISSION NO. 227:**

22 Admit that YOU did not PROFIT from publishing the perfect10.com website
23 in 2001.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 227:**

25 Perfect 10 has insufficient information to admit or deny the request, because
26 the costs of running Perfect 10's website have been, at times, less than the revenues
27 made from that website. Depending on how the other expenses of Perfect 10, Inc. are

1 allocated, one could conceivably conclude that the website was profitable or
2 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
3 money each year due to massive infringement by GOOGLE and others.

4 **REQUEST FOR ADMISSION NO. 228:**

5 Admit that YOU did not PROFIT from publishing the perfect10.com website
6 in 2002.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 228:**

8 Perfect 10 has insufficient information to admit or deny the request, because
9 the costs of running Perfect 10's website have been, at times, less than the revenues
10 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
11 allocated, one could conceivably conclude that the website was profitable or
12 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
13 money each year due to massive infringement by GOOGLE and others.

14 **REQUEST FOR ADMISSION NO. 229:**

15 Admit that YOU did not PROFIT from publishing the perfect10.com website
16 in 2003.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 229:**

18 Perfect 10 has insufficient information to admit or deny the request, because
19 the costs of running Perfect 10's website have been, at times, less than the revenues
20 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
21 allocated, one could conceivably conclude that the website was profitable or
22 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
23 money each year due to massive infringement by GOOGLE and others.

24 **REQUEST FOR ADMISSION NO. 230:**

25 Admit that YOU did not PROFIT from publishing the perfect10.com website
26 in 2004.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 230:**

1 Perfect 10 has insufficient information to admit or deny the request, because
2 the costs of running Perfect 10's website have been, at times, less than the revenues
3 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
4 allocated, one could conceivably conclude that the website was profitable or
5 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
6 money each year due to massive infringement by GOOGLE and others.

7 **REQUEST FOR ADMISSION NO. 231:**

8 Admit that YOU did not PROFIT from publishing the perfect10.com website
9 in 2005.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 231:**

11 Perfect 10 has insufficient information to admit or deny the request, because
12 the costs of running Perfect 10's website have been, at times, less than the revenues
13 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
14 allocated, one could conceivably conclude that the website was profitable or
15 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
16 money each year due to massive infringement by GOOGLE and others.

17 **REQUEST FOR ADMISSION NO. 232:**

18 Admit that YOU did not PROFIT from publishing the perfect10.com website
19 in 2006.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 232:**

21 Perfect 10 has insufficient information to admit or deny the request, because
22 the costs of running Perfect 10's website have been, at times, less than the revenues
23 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
24 allocated, one could conceivably conclude that the website was profitable or
25 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
26 money each year due to massive infringement by GOOGLE and others.

27 **REQUEST FOR ADMISSION NO. 233:**

1 Admit that YOU did not PROFIT from publishing the perfect10.com website
2 in 2007.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 233:**

4 Perfect 10 has insufficient information to admit or deny the request, because
5 the costs of running Perfect 10's website have been, at times, less than the revenues
6 made from that website. Depending on how the other-expenses of Perfect 10, Inc. are
7 allocated, one could conceivably conclude that the website was profitable or
8 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
9 money each year due to massive infringement by GOOGLE and others.

10 **REQUEST FOR ADMISSION NO. 234:**

11 Admit that YOU have never PROFITED from publishing the perfect10.com
12 website in any given fiscal year in which YOU published it.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 234:**

14 Perfect 10 has insufficient information to admit or deny the request, because
15 the costs of running Perfect 10's website have been, at times, less than the revenues
16 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
17 allocated, one could conceivably conclude that the website was profitable or
18 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
19 money each year due to massive infringement by GOOGLE and others.

20 **REQUEST FOR ADMISSION NO. 235:**

21 Admit that YOU have never PROFITED from publishing the PERFECT 10
22 WEBSITES in any given fiscal year in which YOU published them.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 235:**

24 Perfect 10 has insufficient information to admit or deny the request, because
25 the costs of running Perfect 10's website have been, at times, less than the revenues
26 made from that website. Depending on how the other expenses of Perfect 10, Inc. are
27 allocated, one could conceivably conclude that the website was profitable or

1 unprofitable, depending on that allocation. Perfect 10 as a whole, however, has lost
2 money each year due to massive infringement by GOOGLE and others.

3 **REQUEST FOR ADMISSION NO. 237:**

4 Admit that YOUR COMMUNICATIONS to GOOGLE have complied with
5 the requirements of GOOGLE's published DMCA policy.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 237:**

7 Objection: Vague and ambiguous. Admitted that Perfect 10 complied with the
8 requirements of the DMCA, 17 U.S.C. Section 512. If there were any inconsistencies
9 between the requirements of the statute and what GOOGLE refers to as "GOOGLE's
10 published DMCA policy," Perfect 10 followed the requirements of the statute.

11 Objection to the terminology "GOOGLE's published DMCA policy." What
12 GOOGLE refers to as "GOOGLE's published DMCA policy" cannot unilaterally
13 alter the statute itself.

14 **REQUEST FOR ADMISSION NO. 238:**

15 Admit that one or more of YOUR COMMUNICATIONS to GOOGLE have
16 not complied with the requirements of GOOGLE's published DMCA policy.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 238:**

18 Objection: Vague and ambiguous. Admitted that Perfect 10 complied with the
19 requirements of the DMCA, 17 U.S.C. Section 512. If there were any inconsistencies
20 between the requirements of the statute and what GOOGLE refers to as "GOOGLE's
21 published DMCA policy," Perfect 10 followed the requirements of the statute.

22 Objection to the terminology "GOOGLE's published DMCA policy." What
23 GOOGLE refers to as "GOOGLE's published DMCA policy" cannot unilaterally
24 alter the statute itself. The remainder of this request is denied.

25 **REQUEST FOR ADMISSION NO. 239:**

26 Admit that GOOGLE's published DMCA policy informs users that for each
27 IMAGE the user wishes to have removed from GOOGLE's Image Search service, the

1 user must provide the exact URL for the IMAGE when submitting DMCA notices
2 regarding Image Search.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 239:**

4 Objection: Vague and ambiguous. GOOGLE's published DMCA policy has
5 recently been changed (in some but not all of its postings), in an attempt to justify
6 GOOGLE's long time policy of not responding to DMCA notices. While certain
7 postings may say that now in 2008 (and others don't), those were not the instructions
8 which Google sent to Perfect 10 in June of 2004, nor were they GOOGLE's policy in
9 2005 either. Google allowed Perfect 10 to send thirty or forty notices, covering
10 thousands of URLs, before recently changing its policy. The current instructions
11 make no sense, as there is no reason to now require the copyright holder to send two
12 different notices, one for web search and a different notice for image search. All that
13 is necessary are instructions for web search, as every image which Google displays in
14 its image search results is contained on some web page on the Internet. On that basis
15 and the other facts listed above, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 391:**

17 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
18 issues listed in Norman Zada's COMMUNICATION dated July 6, 2004 (control
19 numbered PG_DMCA0160-0173) with that COMMUNICATION.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 391**

21 Objection: Irrelevant, since Google did not ask for magazines in connection
22 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
23 magazines with the DMCA notice itself, but Perfect 10 did offer Google a free
24 password to its website, perfect10.com, where the copyrighted images could be
25 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
26 provide Google with copies of images from Perfect 10 magazines, both in its
27 discovery responses and in its motion for preliminary injunction.

1 **REQUEST FOR ADMISSION NO. 402:**

2 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
3 issues listed in Norman Zada's COMMUNICATION dated July 11, 2004 (control
4 numbered PG_DMCA0232-0245) with that COMMUNICATION.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 402**

6 Objection: Irrelevant, since Google did not ask for magazines in connection
7 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
8 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
9 password to its website, perfect10.com, where the copyrighted images could be
10 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
11 provide Google with copies of images from Perfect 10 magazines, both in its
12 discovery responses and in its motion for preliminary injunction.

13 **REQUEST FOR ADMISSION NO. 411:**

14 Admit that YOU did not provide GOOGLE with copies of any of the Perfect
15 10 Magazine issues listed in Norman Zada's COMMUNICATION dated July 19,
16 2004 (control numbered PG_DMCA0246-0298).

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 411**

18 Objection: Irrelevant, since Google did not ask for magazines in connection
19 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
20 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
21 password to its website, perfect10.com, where the copyrighted images could be
22 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
23 provide Google with copies of images from Perfect 10 magazines, both in its
24 discovery responses and in its motion for preliminary injunction.

25 **REQUEST FOR ADMISSION NO. 422:**

26

27

1 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
2 issues listed in Norman Zada's COMMUNICATION dated October 11, 2004 (control
3 numbered PG_DMCA0299-0307) with that COMMUNICATION.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 422**

5 Objection: Irrelevant, since Google did not ask for magazines in connection
6 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
7 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
8 password to its website, perfect10.com, where the copyrighted images could be
9 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
10 provide Google with copies of images from Perfect 10 magazines, both in its
11 discovery responses and in its motion for preliminary injunction.

12 **REQUEST FOR ADMISSION NO. 431:**

13 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
14 issues listed in Norman Zada's COMMUNICATION dated November 2, 2004
15 (control numbered PG_DMCA0323-0332) with that COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 431**

17 Objection: Irrelevant, since Google did not ask for magazines in connection
18 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
19 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
20 password to its website, perfect10.com, where the copyrighted images could be
21 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
22 provide Google with copies of images from Perfect 10 magazines, both in its
23 discovery responses and in its motion for preliminary injunction.

24 **REQUEST FOR ADMISSION NO. 440:**

25 Admit that YOU did not provide GOOGLE with copies of any of the Perfect
26 10 Magazine issues listed in Norman Zada's COMMUNICATION dated November
27 8, 2004 (control numbered PG_DMCA0343-0352).

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 440**

2 Objection: Irrelevant, since Google did not ask for magazines in connection
3 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
4 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
5 password to its website, perfect10.com where the copyrighted images could be
6 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
7 provide Google with copies of images from Perfect 10 magazines, both in its
8 discovery responses and in its motion for preliminary injunction.

9 **REQUEST FOR ADMISSION NO. 453:**

10 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
11 issues listed in Norman Zada’s COMMUNICATION November 18, 2004 (control
12 numbered PG_DMCA0376-0384) with that COMMUNICATION.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 453**

14 Objection: Irrelevant, since Google did not ask for magazines in connection
15 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
16 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
17 password to its website, perfect10.com where the copyrighted images could be
18 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
19 provide Google with copies of images from Perfect 10 magazines, both in its
20 discovery responses and in its motion for preliminary injunction.

21 **REQUEST FOR ADMISSION NO. 461:**

22 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
23 issues listed in Norman Zada’s COMMUNICATION dated November 26, 2004
24 (control numbered PG_DMCA0389-0401) with that COMMUNICATION.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 461**

26 Objection: Irrelevant, since Google did not ask for magazines in connection
27 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the

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4735.751320/2624735

1 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
2 password to its website, perfect10.com, where the copyrighted images could be
3 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
4 provide Google with copies of images from Perfect 10 magazines, both in its
5 discovery responses and in its motion for preliminary injunction.

6 **REQUEST FOR ADMISSION NO 470:**

7 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
8 issues listed in Norman Zada's COMMUNICATION dated December 1, 2004
9 (control numbered PG_DMCA0411_A_01-09 and PG_DMCA_A_14) with that
10 COMMUNICATION.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 470**

12 Objection: Irrelevant, since Google did not ask for magazines in connection
13 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
14 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
15 password to its website, perfect10.com where the copyrighted images could be
16 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
17 provide Google with copies of images from Perfect 10 magazines, both in its
18 discovery responses and in its motion for preliminary injunction.

19 **REQUEST FOR ADMISSION NO. 479:**

20 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
21 issues listed in Norman Zada's COMMUNICATION dated December 9, 2004
22 (control numbered PG_DMCA0411_B_01-09 and PG_DMCA_B_15) with that
23 COMMUNICATION.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 479**

25 Objection: Irrelevant, since Google did not ask for magazines in connection
26 with this DMCA notice. Admitted that Perfect 10 did. not enclose copies of the
27 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free

1 password to its website, perfect10.com where the copyrighted images could be
2 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
3 provide Google with copies of images from Perfect 10 magazines, both in its
4 discovery responses and in its motion for preliminary injunction.

5 **REQUEST FOR ADMISSION NO. 487:**

6 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
7 issues listed in Norman Zada's COMMUNICATION dated December 21, 2004
8 (control numbered PG_DMCA0412-0422) with that COMMUNICATION.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 487**

10 Objection: Irrelevant, since Google did not ask for magazines in connection
11 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
12 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
13 password to its website, perfect10.com where the copyrighted images could be
14 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
15 provide Google with copies of images from Perfect 10 magazines, both in its
16 discovery responses and in its motion for preliminary injunction.

17 **REQUEST FOR ADMISSION NO. 498:**

18 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
19 issues listed in Norman Zada's COMMUNICATION dated December 27, 2004
20 (control numbered PG_DMCA0428-0437) with that COMMUNICATION.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 498**

22 Objection: Irrelevant, since Google did not ask for magazines in connection
23 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
24 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
25 password to its website, perfect10.com, where the copyrighted images could be
26 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did

1 provide Google with copies of images from Perfect 10 magazines, both in its
2 discovery responses and in its motion for preliminary injunction.

3 **REQUEST FOR ADMISSION NO. 507:**

4 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
5 issues listed in Norman Zada's COMMUNICATION dated December 29, 2004
6 (control numbered PG_DMCA0446-0454) with that COMMUNICATION.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 507**

8 Objection: Irrelevant, since Google did not ask for magazines in connection
9 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
10 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
11 password to its website, perfect10.com, where the copyrighted images could be
12 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
13 provide Google with copies of images from Perfect 10 magazines, both in its
14 discovery responses and in its motion for preliminary injunction.

15 **REQUEST FOR ADMISSION NO. 515:**

16 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
17 issues listed in Norman Zada's COMMUNICATION dated December 31, 2004
18 (control numbered PG_DMCA0462-0470) with that COMMUNICATION.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 515**

20 Objection: Irrelevant, since Google did not ask for magazines in connection
21 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
22 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
23 password to its website, perfect10.com, where the copyrighted images could be
24 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
25 provide Google with copies of images from Perfect 10 magazines, both in its
26 discovery responses and in its motion for preliminary injunction.

27 **REQUEST FOR ADMISSION NO.522:**

1 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
2 issues listed in Norman Zada's COMMUNICATION dated January 3, 2005 (control
3 numbered PG_DMCA0485-0495) with that COMMUNICATION.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 522**

5 Objection: Irrelevant, since Google did not ask for magazines in connection
6 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
7 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
8 password to its website, perfect10.com, where the copyrighted images could be
9 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
10 provide Google with copies of images from Perfect 10 magazines, both in its
11 discovery responses and in its motion for preliminary injunction.

12 **REQUEST FOR ADMISSION NO. 529:**

13 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
14 issues listed in Norman Zada's COMMUNICATION dated January 16, 2005 (control
15 numbered PG_DMCA0512-0521) with that COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 529**

17 Objection: Irrelevant, since Google did not ask for magazines in connection
18 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
19 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
20 password to its website, perfect10.com, where the copyrighted images could be
21 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
22 provide Google with copies of images from Perfect 10 magazines, both in its
23 discovery responses and in its motion for preliminary injunction.

24 **REQUEST FOR ADMISSION NO. 540:**

25 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
26 issues listed in Norman Zada's COMMUNICATION dated January 21, 2005 (control
27 numbered PG_DMCA0531-0539) with that COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 540**

2 Objection: Irrelevant, since Google did not ask for magazines in connection
3 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
4 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
5 password to its website, perfect10.com, where the copyrighted images could be
6 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
7 provide Google with copies of images from Perfect 10 magazines, both in its
8 discovery responses and in its motion for preliminary injunction.

9 **REQUEST FOR ADMISSION NO. 548:**

10 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
11 issues listed in Norman Zada’s COMMUNICATION dated January 25, 2005 (control
12 numbered GGL000778-000782) with that COMMUNICATION.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 548**

14 Objection: Irrelevant, since Google did not ask for magazines in connection
15 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
16 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
17 password to its website, perfect10.com, where the copyrighted images could be
18 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
19 provide Google with copies of images from Perfect 10 magazines, both in its
20 discovery responses and in its motion for preliminary injunction.

21 **REQUEST FOR ADMISSION NO. 557:**

22 Admit that YOU did not enclose copies of any of the Perfect 1.0 Magazine
23 issues listed in Norman Zada’s COMMUNICATION dated February 3, 2005 (control
24 numbered PG_DMCA0560-0568) with that COMMUNICATION.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 557**

26 Objection: Irrelevant, since Google did not ask for magazines in connection
27 with this DMCA notice. Admitted that Perfect 10, did not enclose copies of the

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1 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
2 password to its website, perfect10.com, where the copyrighted images could be
3 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
4 provide Google with copies of images from Perfect 10 magazines, both in its
5 discovery responses and in its motion for preliminary injunction.

6 **REQUEST FOR ADMISSION NO. 566:**

7 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
8 issues listed in Norman Zada's COMMUNICATION dated February 7, 2005 (control
9 numbered PG_DMCA0574-0587) with that COMMUNICATION.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 566**

11 Objection: Irrelevant, since Google did not ask for magazines in connection
12 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
13 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
14 password to its website, perfect10.com, where the copyrighted images could be
15 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
16 provide Google with copies of images from Perfect 10 magazines, both in its
17 discovery responses and in its motion for preliminary injunction.

18 **REQUEST FOR ADMISSION NO. 575:**

19 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
20 issues listed in Norman Zada's COMMUNICATION dated February 11, 2005
21 (control numbered PG_DMCA0592-0603) with that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 575**

23 Objection: Irrelevant, since Google did not ask for magazines in connection
24 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
25 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
26 password to its website, perfect10.com, where the copyrighted images could be
27 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did

1 provide Google with copies of images from Perfect 10 magazines, both in its
2 discovery responses and in its motion for preliminary injunction.

3 **REQUEST FOR ADMISSION NO. 584:**

4 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
5 issues listed in Norman Zada's COMMUNICATION dated February 17, 2005
6 (control numbered PG_DMCA0608-0620) with that COMMUNICATION.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 584**

8 Objection: Irrelevant, since Google did not ask for magazines in connection
9 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
10 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
11 password to its website, perfect10.com, where the copyrighted images could be
12 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
13 provide Google with copies of images from Perfect 10 magazines, both in its
14 discovery responses and in its motion for preliminary injunction.

15 **REQUEST FOR ADMISSION NO. 592:**

16 Admit that YOU did not provide GOOGLE with copies of any of the Perfect
17 10 Magazine issues listed in Norman Zada's COMMUNICATION dated March 6,
18 2005 (control numbered PG_DMCA0621-0636).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 592**

20 Objection: Irrelevant, since Google did not ask for magazines in connection
21 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
22 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
23 password to its website, perfect10.com, where the copyrighted images could be
24 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
25 provide Google with copies of images from Perfect 10 magazines, both in its
26 discovery responses and in its motion for preliminary injunction.

27 **REQUEST FOR ADMISSION NO. 600:**

1 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
2 issues listed in Norman Zada's COMMUNICATION dated April 3, 2005 (control
3 numbered PG_DMCA0637-0652) with that COMMUNICATION.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 600**

5 Objection: Irrelevant, since Google did not ask for magazines in connection
6 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
7 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
8 password to its website, perfect10.com, where the copyrighted images could be
9 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
10 provide Google with copies of images from Perfect 10 magazines, both in its
11 discovery responses and in its motion for preliminary injunction.

12 **REQUEST FOR ADMISSION NO. 608:**

13 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
14 issues listed in Norman Zada's COMMUNICATION dated April 11, 2005 (control
15 numbered PG_DMCA0653-0668) with that COMMUNICATION.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 608**

17 Objection: Irrelevant, since Google did not ask for magazines in connection
18 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
19 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
20 password to its website, perfect10.com, where the copyrighted images could be
21 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
22 provide Google with copies of images from Perfect 10 magazines, both in its
23 discovery responses and in its motion for preliminary injunction.

24 **REQUEST FOR ADMISSION NO. 619:**

25 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
26 issues listed in Norman Zada's COMMUNICATION dated May 1, 2005 (control
27 numbered PG_DMCA0669-0676) with that COMMUNICATION.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 619**

2 Objection: Irrelevant, since Google did not ask for magazines in connection
3 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
4 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
5 password to its website, perfect10.com, where the copyrighted images could be
6 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
7 provide Google with copies of images from Perfect 10 magazines, both in its
8 discovery responses and in its motion for preliminary injunction.

9 **REQUEST FOR ADMISSION NO. 626:**

10 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
11 issues listed in Norman Zada’s COMMUNICATION dated May 7, 2005 (control
12 numbered PG_DMCA0677-0686) with that COMMUNICATION.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 626**

14 Objection: Irrelevant, since Google did not ask for magazines in connection
15 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
16 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
17 password to its website, perfect10.com, where the copyrights images could be
18 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
19 provide Google with copies of images from Perfect 10 magazines, both in its
20 discovery responses and in its motion for preliminary injunction.

21 **REQUEST FOR ADMISSION NO. 635:**

22 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
23 issues listed in Norman Zada’s COMMUNICATION dated June 12, 2005 (control
24 numbered PG_DMCA0693-0707) with that COMMUNICATION.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 635**

26 Objection: Irrelevant, since Google did not ask for magazines in connection
27 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the

1 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
2 password to its website, perfect10.com, where the copyrighted images could be
3 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
4 provide Google with copies of images from Perfect 10 magazines, both in its
5 discovery responses and in its motion for preliminary injunction.

6 **REQUEST FOR ADMISSION NO. 644:**

7 Admit that YOU did not provide GOOGLE with copies of any of the Perfect
8 10 Magazine issues listed in Norman Zada's COMMUNICATION dated June 19,
9 2005 (control numbered GGL000745-000752).

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 644**

11 Objection: Irrelevant, since Google did not ask for magazines in connection
12 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
13 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
14 password to its website, perfect10.com, where the copyrighted images could be
15 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
16 provide Google with copies of images from Perfect 10 magazines, both in its
17 discovery responses and in its motion for preliminary injunction.

18 **REQUEST FOR ADMISSION NO. 650:**

19 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
20 issues listed in Norman Zada's COMMUNICATION dated July 16, 2005 (control
21 numbered GGL005781-5798) with that COMMUNICATION.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 650**

23 Objection: Irrelevant, since Google did not ask for magazines in connection
24 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
25 magazines with the DMCA notice, itself, but Perfect. 10 did offer Google a free
26 password to its website, perfect10.com, where the copyrighted images could be
27 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did

1 provide Google with copies of images from Perfect 10 magazines, both in its
2 discovery responses and in its motion for preliminary injunction.

3 **REQUEST FOR ADMISSION NO. 672:**

4 Admit that YOU did not enclose copies of any of the Perfect 10 Magazine
5 issues listed in Norman Zada’s COMMUNICATION dated August 30, 2005 (control
6 numbered GGL005305-5312) with that COMMUNICATION.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 672**

8 Objection: Irrelevant, since Google did not ask for magazines in connection
9 with this DMCA notice. Admitted that Perfect 10 did not enclose copies of the
10 magazines with the DMCA notice, itself, but Perfect 10 did offer Google a free
11 password to its website, perfect10.com, where the copyrighted images could be
12 viewed, on June 28, 2004 and thereafter. Furthermore, in 2005, Perfect 10 did
13 provide Google with copies of images from Perfect 10 magazines, both in its
14 discovery responses and in its motion for preliminary injunction.

15 **B. GOOGLE’S POSITION :**

16 In its responses to the 76 Requests identified above, Perfect 10 added
17 inappropriate and often inflammatory commentary. Of these Requests, 31 of them
18 seek admissions regarding various aspects of Perfect 10’s purported DMCA notices.
19 Specifically, these 31 Requests ask whether Perfect 10 “enclose[d] copies of any of
20 the Perfect 10 Magazine issues listed in” the respective alleged DMCA notices. This
21 is an important issue under the DMCA because the DMCA requires the complainant
22 to identify the copyrighted material at issue, and if Perfect 10 did not do so (by
23 attaching or enclosing a copy of it), then its alleged DMCA notice was defective as a
24 matter of law.

25 The other 45 Requests seek to determine Perfect 10’s positions on
26 various of its claims, including whether Google’s alleged liability for allegedly
27 linking to web pages displaying Perfect 10 passwords, the fair use of Google’s

1 display of thumbnail images in Image Search results, and the basis for Perfect 10's
2 claims for damages. Again, these are the type of requests that Judge Matz described
3 as "a very direct, informal and cheap way of narrowing the issues" at the October 6,
4 2008 Status Conference. Herrick Decl., Exh. H.

5 Nevertheless, Perfect 10 improperly responded by burying its
6 substantive response amongst argumentative and non-responsive commentary. This
7 is improper under Rule 36. Responses to requests for admission are not a vehicle for
8 argument concerning the correct interpretation of facts, but rather, are tools to
9 establish the undisputed facts themselves. Their purpose is to narrow issues for
10 motions and for trial, a purpose which Perfect 10's unresponsive commentary has
11 subverted in these requests. Perfect 10's attempts to inject argumentative and often
12 inflammatory commentary into its responses to Google's Requests for Admission
13 should not be allowed.

14 Under Rule 36, responses to requests for admission "must fairly respond
15 to the substance of the matter." Fed. R. Civ. P. 36(a)(4). A party is permitted to
16 "qualify an answer or deny only a part of a matter," but the Rule does not allow
17 Perfect 10 insert non-responsive commentary. Id.; see Tulip Computers Intern., B.V.
18 v. Dell Computer Corp., 210 F.R.D. 100, 107 (D. Del. 2002) ("Requests for
19 admission should be phrased so that they may be admitted or denied with minimal
20 commentary.") Perfect 10's responses have done just that.

21 For example, Google's Requests for Admission Nos. 99 and 100 ask
22 Perfect 10 to "[a]dmit that GOOGLE does not prevent [copyright holders and/or
23 PERFECT 10] from providing DMCA-compliant notifications." The requests seek to
24 narrow the dispute between the parties by establishing whether or not Perfect 10
25 intends to argue that Google had in some way prevented Perfect 10 or other copyright
26 holders from submitting DMCA-compliant notifications to Google. Instead of

1 sufficiently responding to these straightforward requests, Perfect 10 offered the
2 following:

3 Google makes it much more difficult than necessary for
4 copyright owners to provide notices that satisfy Google’s
5 purported requirements. GOOGLE purports to require
6 things in notices that are not required by the DMCA itself.
7 Google publishes DMCA notices and infringing URLs that
8 are the subject of those notices on chillingeffects.org,
9 thereby giving infringers the very information to locate the
10 infringing material. GOOGLE does not make available to
11 copyright holders all of the images that it stores on its
12 servers, and does not assist Perfect 10 in locating infringing
13 images in its indexes and databases. Furthermore, Google
14 has obstructed discovery in this case. Google does not
15 remove or disable access to infringing material that it is
16 notified about in compliant DMCA notices, but instead
17 comes up with contrived excuses for not acting. While
18 Google does not prevent copyright holders from providing
19 DMCA-compliant notices, Google does not act on them.

20 Perfect 10 denies the remainder of this request.

21 Save for a portion of the final sentence, this entire statement is non-responsive,
22 inflammatory and argumentative. Google requested an admission that Google does
23 not prevent Perfect 10 or other copyright holders from providing “DMCA-complaint
24 notifications”—not whether Google prevents anyone from satisfying “Google’s
25 purported requirements.” Similarly, whether Google’s policies differ from the
26 DMCA itself; what Google does with notices it has received; whether Google makes
27 available images on its servers; whether Google assists Perfect 10 in locating images;

1 whether Google has “obstructed discovery”; and whether Google contrives excuses
2 for inaction all have nothing to do with the requests in question, which ask for an
3 admission regarding whether Google prevents copyright holders and/or Perfect 10
4 from providing DMCA-compliant notifications. Such inflammatory and
5 argumentative (not to mention inaccurate) language renders Perfect 10’s Response
6 worthless to Google in preparing its case for trial, and runs afoul of governing
7 authorities forbidding such commentary. Plainly, Perfect 10’s commentary appears
8 to be designed to distract and mislead a jury regarding the substance of Perfect 10’s
9 possible admission, should the response ever be presented in court—a tactic Rule 36
10 prohibits.

11 Even after Google initiated meet and confer efforts with Perfect 10
12 discussing the insufficiency of Perfect 10’s Responses to Google’s First Set of
13 Requests for Admission that included non-responsive commentary, Perfect 10
14 included similar unnecessary remarks in its responses to 31 Requests for Admission
15 in Google’s Second Set. For instance, in response to Request No. 381 (“Admit that
16 YOU did not enclose copies of any of the Perfect 10 Magazine issues listed in
17 Norman Zada’s COMMUNICATION dated June 28, 2004 (control numbered
18 PG_DMCA0128-0141) with that COMMUNICATION.”), Perfect 10 responded:

19 Objection: Irrelevant, since Google did not ask for
20 magazines in connection with this DMCA notice. Admitted
21 that Perfect 10 did not enclose copies of the magazines with
22 the DMCA notice itself, but Perfect 10 did offer Google a
23 free password to its website, perfect10.com, where the
24 copyrighted images could be viewed, on June 28, 2004 and
25 thereafter. Furthermore, in 2005, Perfect 10 did provide
26 Google with copies of images from Perfect 10 magazines,

1 both in its discovery responses and in its motion for
2 preliminary injunction.
3 Perfect 10 used this same language in its responses to another 30 of Google's
4 Requests for Admission seeking information regarding Perfect 10's purported DMCA
5 notifications to Google. The only portion of Perfect 10's response that "fairly
6 respond[s] to the substance of the matter" is Perfect 10's admission "that Perfect 10
7 did not enclose copies of the magazines with the DMCA notice itself." No other
8 response to the request is necessary or relevant to the matter requested. The request
9 did not concern offers of free passwords to perfect10.com, Perfect 10's discovery
10 responses, or Perfect 10's declarations in support of its motion for a preliminary
11 injunction. Perfect 10 will have the opportunity to make its argument that it
12 sufficiently identified the copyrighted material it claimed was infringed in various
13 other communications with Google, but Perfect 10's other actions have no bearing on
14 whether it enclosed copies of any Perfect 10 magazines in its purported DMCA
15 notices to Google.

16 Perfect 10's argumentative qualifications and non-responsive
17 commentary render Perfect 10's Responses inadequate under Rule 36. Responses to
18 requests for admission are insufficient when they include statements unrelated to the
19 matter requested. See Harris v. Oil Reclaiming Co., Ltd., 190 F.R.D. 674, 677
20 (D.Kan. 1999) (finding that responses containing non-responsive statements were
21 insufficient under Rule 36 and ordering amendment of the responses to excise the
22 non-responsive statements); Xcel Energy, Inc. v. U.S., 237 F.R.D. 416, 422 (D.Minn.
23 2006) ("Legal jousting, and advocacy, play such a predominate role in the crafting of
24 Interrogatories, and their Answers, that it should not be allowed to infect the laudable
25 purposes of Rule 36 in eliminating issues for which proof is not required, and in
26 narrowing issues where proof is."). Perfect 10 should be ordered to amend its
27 responses to remove the non-responsive and argumentative language to comply with

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1 the requirements of Rule 36. Specifically, Perfect 10 should be ordered to delete the
2 following argumentative commentary from its responses to these requests:

3 **Request No. Argumentative Commentary in Perfect 10’s Response That**
4 **Should Be Deleted:**

5 17 “Google does provide links to infringing images which come from
6 the password-protected area of perfect10.com.” and “Google would
7 have that information.”

8 18 Everything but “Admitted.”

9 19 Everything but “Admitted.”

10 28 Everything but “Admitted.”

11 36 “GOOGLE uses what it refers to as THUMBNAIL IMAGES (which
12 are really much larger than a person’s thumbnail) for purposes of
13 infringement” and “if this request is understandable, it is something
14 that Google would have information on.”

15 37 “GOOGLE uses what it refers to as THUMBNAIL IMAGES (which
16 are really much larger than a person’s thumbnail) for purposes of
17 infringement. There are REDUCED SIZE IMAGES that have
18 artistic expression” and “if this request is understandable, it is
19 something that Google would have information on.”

20 40 “There is no justification for using images or anything else to help
21 people locate stolen materials.”

22 56 “GOOGLE has so much power and influence on the Internet that it
23 can effectively control most third party websites.”

24 96 “GOOGLE does not make available to copyright holders all of the
25 images that it stores on its servers, and does not assist Perfect 10 in
26 locating infringing images in its indexes and databases.

27 Furthermore, Google has obstructed discovery in this case.”

1 99 Everything but “Google does not prevent copyright holders from
2 providing DMCA-compliant notices.”
3 100 Everything but “Google does not prevent Perfect 10 from providing
4 DMCA-compliant notices.”
5 145 Everything but “Admitted that GOOGLE does not control every
6 aspect of the Internet.”
7 147 Everything but “Denied. Perfect 10 still sells back issues of the
8 magazine.”
9 158 “The problem, of course, is that GOOGLE offers cell phone
10 downloads of stolen Perfect 10 images for free, destroying the
11 market for authorized images that are paid for.”
12 166 “Perfect 10’s revenues have been severely impacted by the fact that
13 GOOGLE offers cell phone downloads of stolen Perfect 10 images
14 for free, destroying the market for authorized images that are paid
15 for.”
16 172 “However, because there are so many of these websites, and they are
17 located all over the world, GOOGLE is in a much better position to
18 control this infringement and reduce damage to the copyrighted
19 works.”
20 194 “Furthermore, Google has obstructed discovery on this.”
21 199 “but many of these users access perfect10.com with stolen
22 passwords obtained from www.google.com” and “Google may have
23 this information.”
24 200 “However, because GOOGLE biases its search results to favor
25 infringing advertising affiliates, Perfect 10’s efforts have not been
26 successful.”
27 205 Everything but “Admitted.”

1 209-210 “However, because Google has infringed so many images and has
2 so many copies of those images in its search index, it would take
3 Perfect 10 years of work to match the registrations with each
4 infringing copy, as Google has requested.”
5 213-222 “due to massive infringement of Perfect 10’s copyrights.”
6 223 “because of massive copyright infringement by GOOGLE and
7 others” and “until it is successful in the litigation.”
8 226-235 “due to massive infringement by GOOGLE and others.”
9 237-238 Delete “Objection to the terminology ‘GOOGLE’s published
10 DMCA policy.’ What GOOGLE refers to as ‘GOOGLE’s published
11 DMCA policy’ cannot unilaterally alter the statute itself.”
12 239 Everything but “certain postings may say that now in 2008.”
13 391, 402, 411, Everything but “Admitted that Perfect 10 did not enclose copies of
14 422, 431, 440, the magazines with the DMCA notice itself.”
15 453, 461, 470,
16 479, 487, 498,
17 507, 515, 522,
18 529, 540, 548,
19 557, 566, 575,
20 584, 592, 600,
21 608, 619, 626,
22 635, 644, 650,
23 and 672

24 Google respectfully requests that the Court to find that Perfect
25 10’s responses to these 77 Requests are insufficient, and to order either that these
26 Requests be deemed admitted in full, or that they be amended consistent with the
27 chart above.

1 **C. PERFECT 10'S POSITION :**

2 **Perfect 10 incorporates its preliminary statement (page 4, line 17 – page 7,**
3 **line 16) and the statement at page 343, line 12 – page 348, line 23 into this**
4 **Section.**

5 As a threshold matter, this Court should not order Perfect 10 to amend any
6 requests in the first set of requests for admissions. As set forth above, Google
7 prematurely served the Joint Stipulation before Perfect 10 had an opportunity to
8 amend responses in the first set. Google should not be rewarded for its over-
9 aggressive conduct.

10 Google is satisfied with what it calls the substance of the responses, but wants
11 this Court to order Perfect 10 to remove certain language. Google claims the
12 language is inappropriate and inflammatory, but it is not. Perfect 10 answered those
13 requests to the best of its ability and has the right to explain its responses. “A party
14 making response to requests for admissions of fact under Rule 36(a) is not deprived
15 of the right to explain, clarify, or elucidate concerning the subject-matter thereof. He
16 may do so in the reponse made to the requests or by the examination or cross-
17 examination of witnesses produced at the trial.” (Knowlton v. Atchison, T. &
18 S..F.Ry.Co., 11 F.R.D. 62, 66 (D.Missouri 1951)). Furthermore, Google drafted its
19 requests so that Perfect 10 would have to admit what would be tantamount to “...half-
20 truths, which if admitted would deprive defendant of an opportunity to explain or
21 clarify by cross-examination. Requests for admission of a fact that relate to a ‘half-
22 truth’ are improper.” (Id.) In its responses to requests for admission, Google made
23 numerous qualifications yet argues that Perfect 10 should not be permitted to explain
24 its responses. Google’s suggestion that Perfect 10 be forced to respond to Google’s
25 requests for admissions without qualification is preposterous.

1 **IV. ISSUE NO. 3: SHOULD P10 BE COMPELLED TO AMEND ITS**
2 **RESPONSES THAT GOOGLE ASSERTS CONTAIN EVASIVE**
3 **DENIALS AND DO NOT FAIRLY RESPOND TO THE SUBSTANCE**
4 **OF THE REQUESTS?**

5 **A. THE REQUESTS AT ISSUE.**

6 **REQUEST FOR ADMISSION NO. 56:**

7 Admit that GOOGLE does not control the third-party websites that PERFECT
8 10 alleges infringe its copyrights.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

10 Objection: Vague and ambiguous. GOOGLE has so much power and influence
11 on the Internet that it can effectively control most third party websites. On this basis,
12 Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 96:**

14 Admit that GOOGLE does not prevent copyright holders from collecting
15 information needed to issue DMCA notifications.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 96:**

17 GOOGLE does not make available to copyright holders all of the images that it
18 stores on its servers, and does not assist Perfect 10 in locating infringing images in its
19 indexes and databases. Furthermore, Google has obstructed discovery in this case. On
20 that basis, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 136:**

22 Admit that GOOGLE does not create ADULT IMAGES.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 136:**

24 Objection: Vague and ambiguous; calls for a legal conclusion. GOOGLE
25 creates and develops adult content by creating reduced size adult images from larger
26 adult images, selecting which images to display to its users, and arranging them on
27 the screen which is displayed to the user. On that basis, Perfect 10 denies this request.

1 **REQUEST FOR ADMISSION NO. 137:**

2 Admit that GOOGLE does not sell ADULT IMAGES.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 137:**

4 GOOGLE makes money from its offering of millions of ADULT IMAGES
5 belonging to others, without authorization. On that basis, Perfect 10 denies the
6 request.

7 **REQUEST FOR ADMISSION NO. 138:**

8 Admit that GOOGLE does not license ADULT IMAGES.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 138:**

10 Google claims that it gives its users the right to view images that it has no
11 rights to. On that basis, Perfect 10 denies the request.

12 **REQUEST FOR ADMISSION NO. 139:**

13 Admit that GOOGLE is not in the business of creating ADULT IMAGES.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 139:**

15 Objection: Vague and ambiguous; calls for a legal conclusion. GOOGLE
16 creates and develops adult content by creating reduced size adult images from larger
17 adult images, selecting which images to display to its users, and arranging them on
18 the screen which is displayed to the user. On that basis, Perfect 10 denies this request.

19 **REQUEST FOR ADMISSION NO. 141:**

20 Admit that GOOGLE is not in the business of licensing ADULT IMAGES.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 141:**

22 Google claims that it gives its users the right to view images that it has no right
23 to. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 142:**

25 Admit that YOU have no evidence that GOOGLE is in the business of
26 licensing ADULT IMAGES.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 142:**

1 Google claims that it gives its users the right to view images that it has no
2 rights to. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 143:**

4 Admit that GOOGLE is not in the business of selling ADULT IMAGES.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 143:**

6 GOOGLE makes money from its offering of millions of ADULT IMAGES
7 belonging to others, without authorization. On that basis, Perfect 10 denies the
8 request.

9 **REQUEST FOR ADMISSION NO. 158:**

10 Admit that as of January 1, 2008, YOUR business relationship with FoneStarz
11 Media Limited had been cancelled.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 158:**

13 Admitted that Perfect 10 is not currently receiving any revenue from
14 FoneStarz. Perfect 10 has entered into discussions with FoneStarz about resuming its
15 relationship. On that basis, Perfect 10 denies the request. The problem, of course, is
16 that GOOGLE offers cell phone downloads of stolen Perfect 10 images for free,
17 destroying the market for authorized images that are paid for.

18 **REQUEST FOR ADMISSION NO. 167:**

19 Admit that GOOGLE does not license THUMBNAIL IMAGES for downloads
20 to mobile phones.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 167:**

22 Google claims that it gives its users the right to view images that it has no
23 rights to. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 168:**

25 Admit that YOU have no evidence that GOOGLE licenses THUMBNAIL
26 IMAGES for downloads to mobile phones.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 168:**

1 Google claims that it gives its users the right to view images that it has no
2 rights to. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 169: .**

4 Admit that GOOGLE does not license REDUCED SIZE IMAGES for
5 downloading to mobile phones.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 169:**

7 Google claims that it gives its users the right to view images that it has no
8 rights to. On that basis, Perfect 10 denies the request.

9 **REQUEST FOR ADMISSION NO. 170:**

10 Admit that YOU have no evidence that GOOGLE licenses REDUCED SIZE
11 IMAGES for downloading to mobile phones.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 170:.**

13 Google claims that it gives its users the right to view images that it has no
14 rights to. On that basis, Perfect 10 denies the request.

15 **REQUEST FOR ADMISSION NO. 197:**

16 Admit that traffic to Perfect10.com has increased as a consequence of
17 perfect10.com's inclusion in the GOOGLE index and search results.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 197:**

19 GOOGLE has been responsible for a massive diversion of traffic away from
20 perfect10.com to infringing websites who are in many cases Google advertising
21 partners. On this basis, Perfect 10 denies the request.

22 **REQUEST FOR ADMISSION NO. 198:**

23 Admit that revenues generated by perfect10.com have increased as a
24 consequence of perfect10.com's inclusion in the GOOGLE index and search results.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 198:**

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27

1 GOOGLE has been responsible for a massive diversion of traffic away from
2 perfect10.com to infringing websites who are in many cases Google advertising
3 partners. On this basis, Perfect 10 denies the request.

4 **REQUEST FOR ADMISSION NO. 205:**

5 Admit that YOU have disabled the passwords identified in REQUEST FOR
6 ADMISSION NO. 204.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 205:**

8 Objection: Vague and ambiguous. Admitted that Perfect 10 has periodically or
9 permanently disabled most passwords that it has identified as having been used to
10 wrongfully access perfect10.com by users who did not pay for those passwords. The
11 only way to completely stop all unauthorized accesses, as long as GOOGLE and
12 others are making hundreds of perfect10.com passwords available to their users, is to
13 completely shut down perfect10.com. On that basis, Perfect 10 denies the remainder
14 of the request.

15 **REQUEST FOR ADMISSION NO. 206:**

16 Admit that YOU have not disabled the passwords identified in REQUEST
17 FOR ADMISSION NO. 204.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 206:**

19 Perfect 10 has periodically or permanently disabled most passwords that it has
20 identified. See Perfect 10's response to the previous request. On this basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 207:**

23 Admit that YOU could disable the passwords identified in REQUEST FOR
24 ADMISSION NO. 204.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 207:**

26 As long as GOOGLE and others are giving away hundreds of passwords to
27 perfect10.com, there is no practical way that Perfect 10 knows of to avoid

1 unauthorized accesses to perfect10.com, without shutting down the website. On that
2 basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 239:**

4 Admit that GOOGLE's published DMCA policy informs users that for each
5 IMAGE the user wishes to have removed from GOOGLE's Image Search service, the
6 user must provide the exact URL for the IMAGE when submitting DMCA notices
7 regarding Image Search.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 239:**

9 Objection: Vague and ambiguous. GOOGLE's published DMCA policy has
10 recently been changed (in some but not all of its postings), in an attempt to justify
11 GOOGLE's long time policy of not responding to DMCA notices. While certain
12 postings may say that now in 2008 (and others don't), those were not the instructions
13 which Google sent to Perfect 10 in June of 2004, nor were they GOOGLE's policy in
14 2005 either. Google allowed Perfect 10 to send thirty or forty notices, covering
15 thousands of URLs, before recently changing its policy. The current instructions
16 make no sense, as there is no reason to now require the copyright holder to send two
17 different notices, one for web search and a different notice for image search. All that
18 is necessary are instructions for web search, as every image which Google displays in
19 its image search results is contained on some web page on the Internet. On that basis
20 and the other facts listed above, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 354:**

22 Admit that for one or more of the URLs listed in Norman Zada's
23 COMMUNICATION dated June 1, 2004 (control numbered PG_DMCA0096-0102)
24 YOU identified a six-page section of an issue of Perfect 10 Magazine as the
25 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
26 URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 354**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 361:**

6 Admit that for one or more of the URLs listed in Norman Zada's
7 COMMUNICATION dated June 4, 2004 (control numbered PG_DMCA0104-0113)
8 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
9 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 361**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10 stated that some of the infringed images may be found in the specified
13 page range, not that all of the images in that page range were infringed at a particular
14 URL. On that basis, Perfect 10 denies the request.

15 **REQUEST FOR ADMISSION NO. 372:**

16 Admit that for at least 23 of the 157 URLs listed in Norman Zada's
17 COMMUNICATION dated June 16, 2004 (control numbered PG_DMCA0116-0127)
18 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
19 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 372**

21 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
22 Perfect 10 stated that some of the infringed images may be found in the specified
23 page range, not that all of the images in that page range were infringed at a particular
24 URL. On that basis, Perfect 10 denies the request.

25 **REQUEST FOR ADMISSION NO. 373:**

26 Admit that for at least 16 of the 157 URLs listed in Norman Zada's
27 COMMUNICATION dated June 16, 2004 (control numbered PG_DMCA0116-0127)

1 YOU identified a seven-page section of an issue in Perfect 10 Magazine as the
2 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
3 URLs.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 373**

5 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
6 Perfect 10 stated that some of the infringed images may be found in the specified
7 page range, not that all of the images in that page range were infringed at a particular
8 URL. On that basis, Perfect 10 denies the request.

9 **REQUEST FOR ADMISSION NO. 382:**

10 Admit that for at least 175 of the 316 URLs listed in Norman Zada's
11 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-0141)
12 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
13 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 382**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10 stated that some of the infringed images may be found in the specified
17 page range, not that all of the images in that page range were infringed at a particular
18 URL. On that basis, Perfect 10 denies the request.

19 **REQUEST FOR ADMISSION NO. 383:**

20 Admit that at least 23 of the 316 URLs listed in Norman Zada's
21 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-0141)
22 YOU identified a nine-page section of an issue of Perfect 10 Magazine as the
23 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
24 URLs.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 383**

26 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
27 Perfect 10 stated that some of the infringed images may be found in the specified

1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 385:**

4 Admit that for one or more of the URLs listed in Norman Zada's
5 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-141)
6 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
7 YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 385**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
11 that the entirety of perfect10.com was being infringed at a particular URL. On this
12 basis, Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 386:**

14 Admit that for at least 55 of the 316 URLs listed in Norman Zada's
15 COMMUNICATION dated June 28, 2004 (control numbered PG_DMCA0128-0141)
16 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
17 YOU claim was infringed at each of those URLs.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 386**

19 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
20 Perfect 10's notice indicated that Google could find a representative sample of
21 infringed images of Amy Weber on amyweber.net, not that the entirety of
22 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
23 denies the request.

24 **REQUEST FOR ADMISSION NO. 392:**

25 Admit that for at least 175 of the 316 URLs listed in Norman Zada's
26 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-0173)

1 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
2 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 392**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 393:**

9 Admit that for at least 23 of the 316 URLs listed in Norman Zada's
10 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-0173)
11 YOU identified a nine-page section of an issue of Perfect 10 Magazine as the
12 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
13 URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 393**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10 stated that some of the infringed images may be found in the specified
17 page range, not that all of the images in that page range were infringed at a particular
18 URL. On that basis, Perfect 10 denies the request.

19 **REQUEST FOR ADMISSION NO. 394:**

20 Admit that for one or more of the URLs listed in Norman Zada's
21 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-0173)
22 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
23 YOU claim was infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 394**

25 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
26 Perfect 10 stated that the images may be found in many cases on perfect10.com, not

1 that the entirety of perfect10.com was being infringed at a particular URL. On this
2 basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 395:**

4 Admit that for at least 55 of the 316 URLs listed in Norman Zada's
5 COMMUNICATION dated July 6, 2004 (control numbered PG_DMCA0160-0173)
6 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
7 YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 395**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10's notice indicated that Google could find a representative sample of
11 infringed images of Amy Weber on amyweber.net, not that the entirety of
12 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
13 denies the request.

14 **REQUEST FOR ADMISSION NO. 403:**

15 Admit that for at least 175 of the 316 URLs listed in Norman Zada's
16 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
17 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
18 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 403**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that some of the infringed images may be found in the specified
22 page range, not that all of the images in that page range were infringed at a particular
23 URL. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 404:**

25 Admit that for at least 23 of the 316 URLs listed in Norman Zada's
26 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
27 YOU identified a nine-page section of an issue of Perfect 10 Magazine as the

1 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
2 URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 404**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 405:**

9 Admit that for one or more URLs listed in Norman Zada's
10 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
11 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
12 YOU claim was infringed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 405**

14 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
15 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
16 that the entirety of perfect10.com was being infringed at a particular URL. On this
17 basis, Perfect 10 denies the request.

18 **REQUEST FOR ADMISSION NO. 406:**

19 Admit that for at least 55 of the 316 URLs listed in Norman Zada's
20 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
21 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
22 YOU claim was infringed at each of those URLs.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 406**

24 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
25 Perfect 10's notice indicated that Google could find a representative sample of
26 infringed images of Amy Weber on amyweber.net, not that the entirety of

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1 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
2 denies the request.

3 **REQUEST FOR ADMISSION NO. 412:**

4 Admit that for at least 235 of the 377 URLs listed in Norman Zada's
5 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)
6 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
7 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 412**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10 stated that some of the infringed images may be found in the specified
11 page range, not that all of the images in that page range were infringed at a particular
12 URL. On that basis, Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 413:**

14 Admit that for at least 33 of the 377 URLs listed in Norman Zada's
15 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)
16 YOU identified a nine-page section of an issue of Perfect 10 Magazine as the
17 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
18 URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 413**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that some of the infringed images may be found in the specified
22 page range, not that all of the images in that page range were infringed at a particular
23 URL. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 414:**

25 Admit that for one or more of the URLs listed in Norman Zada's
26 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)

1 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
2 YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 414**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
6 that the entirety of perfect10.com was being infringed at a particular URL. On this
7 basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 415:**

9 Admit that for at least 55 of the 377 URLs listed in Norman Zada's
10 COMMUNICATION dated July 19, 2004 (control numbered PG_DMCA0246-0298)
11 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
12 YOU claim was infringed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 415**

14 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
15 Perfect 10's notice indicated that Google could find a representative sample of
16 infringed images of Amy Weber on amyweber.net, not that the entirety of
17 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
18 denies the request.

19 **REQUEST FOR ADMISSION NO. 423:**

20 Admit that for at least 112 of the URLs listed in Norman Zada's
21 COMMUNICATION dated October 11, 2004 (control numbered PG_DMCA0299-
22 0307) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
23 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 423**

25 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
26 Perfect 10 stated that some of the infringed images may be found in the specified

1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 424:**

4 Admit that for at least 59 of the URLs listed in Norman Zada's
5 COMMUNICATION dated October 11, 2004 (control numbered PG_DMCA0299-
6 0307) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
7 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
8 URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO 424**

10 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
11 Perfect 10 stated that some of the infringed images may be found in the specified
12 page range, not that all of the images in that page range were infringed at a particular
13 URL. On that basis, Perfect 10 denies the request.

14 **REQUEST FOR ADMISSION NO. 425:**

15 Admit that for one or more of the URLs listed in Norman Zada's
16 COMMUNICATION dated October 11, 2004 (control numbered PG_DMCA0299-
17 0307) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
18 MATERIAL YOU claim was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 425**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
22 that the entirety of perfect10.com was being infringed at a particular URL. On this
23 basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 426:**

25 Admit that for one or more of the URLs listed in Norman Zada's
26 COMMUNICATION dated October 11, 2004 (control numbered PG_DMCA0299-

1 0307) YOU identified ambersmith.net as the ALLEGED COPYRIGHTED
2 MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 426**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10's notice indicated that Google could find a representative sample of
6 infringed images of Amber Smith on ambersmith.net, not that the entirety of
7 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
8 denies the request.

9 **REQUEST FOR ADMISSION NO. 427:**

10 Admit that for at least 32 of the 148 URLs listed in Norman Zada's
11 COMMUNICATION dated October 11, 2004 (control numbered PG_DMCA0299-
12 0307) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
13 MATERIAL YOU claim was infringed at each of those URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 427**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10's notice indicated that Google could find a representative sample of
17 infringed images of Amy Weber on amyweber.net, not that the entirety of
18 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
19 denies the request.

20 **REQUEST FOR ADMISSION NO. 432:**

21 Admit that for at least 105 of the 160 URLs listed in Norman Zada's
22 COMMUNICATION dated November 2, 2004 (control numbered PG_DMCA0323-
23 0332) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
24 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 432**

26 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
27 Perfect 10 stated that some of the infringed images may be found in the specified

1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 433:**

4 Admit that for at least 45 of the 160 URLs listed in Norman Zada's
5 COMMUNICATION dated November 2, 2004 (control numbered PG_DMCA0323-
6 0332) YOU identified a seven-page section of an issue in Perfect 10 Magazine as the
7 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
8 URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 433**

10 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
11 Perfect 10 stated that some of the infringed images may be found in the specified
12 page range, not that all of the images in that page range were infringed at a particular
13 URL. On that basis, Perfect 10 denies the request.

14 **REQUEST FOR ADMISSION NO. 434:**

15 Admit that for one or more of the URLs listed in Norman Zada's
16 COMMUNICATION dated November 2, 2004 (control numbered PG_DMCA0323-
17 0332) YOU identified ambersmith.net as the ALLEGED COPYRIGHTED
18 MATERIAL YOU claim was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 434**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10's notice indicated that Google could find a representative sample of
22 infringed images of Amber Smith on ambersmith.net, not that the entirety of
23 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
24 denies the request.

25 **REQUEST FOR ADMISSION NO. 435:**

26 Admit that for at least 48 of the 160 URLs listed in Norman Zada's
27 COMMUNICATION dated November 2, 2004 (control numbered PG_DMCA0323-

1 0332) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
2 MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 435**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10's notice indicated that Google could find a representative sample of
6 infringed images of Amy Weber on amyweber.net, not that the entirety of
7 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
8 denies the request.

9 **REQUEST FOR ADMISSION NO 441:**

10 Admit that for at least 61 of the 139 URLs listed in Norman Zada's
11 COMMUNICATION dated November 8, 2004 (control numbered PG_DMCA0343-
12 0352) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
13 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 441**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10 stated that some of the infringed images may be found in the specified
17 page range, not that all of the images in that page range were infringed at a particular
18 URL. On that basis, Perfect 10 denies the request.

19 **REQUEST FOR ADMISSION NO. 442:**

20 Admit that for one or more of the URLs listed in Norman Zada's
21 COMMUNICATION dated November 8, 2004 (control numbered PG_DMCA0343-
22 0352) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
23 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
24 URLs.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 442**

26 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
27 Perfect 10 stated that some of the infringed images may be found in the specified

1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 443:**

4 Admit that for at least 78-of the 139 URLs listed in Norman Zada's
5 COMMUNICATION dated November 8, 2004 (control numbered PG_DMCA0343-
6 0352) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
7 MATERIAL YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 443**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10's notice indicated that Google could find a representative sample of
11 infringed images of Amy Weber on amyweber.net, not that the entirety of
12 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
13 denies the request.

14 **REQUEST FOR ADMISSION NO. 447:**

15 Admit that for at least 119 of the 176 URLs listed in Norman Zada's
16 COMMUNICATION dated November 16, 2004 (control numbered PG_DMCA0360-
17 0370) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
18 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 447**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that some of the infringed images may be found in the specified
22 page range, not that all of the Images in that page range were infringed at a particular
23 URL. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 448:**

25 Admit that for at least 25 of the 176 URLs listed in Norman Zada's
26 COMMUNICATION dated November 16, 2004 (control numbered PG_DMCA0360-
27 0370) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the

1 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
2 URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 448**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 449:**

9 Admit that for at least 56 of the 176 URLs listed in Norman Zada's
10 COMMUNICATION dated November 16, 2004 (control numbered PG_DMCA0360-
11 0370). YOU identified amyweber.net as the ALLEGED COPYRIGHTED
12 MATERIAL YOU claim was infringed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 449**

14 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
15 Perfect 10's notice indicated that Google could find a representative sample of
16 infringed images of Amy Weber on amyweber.net, not that the entirety of
17 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
18 denies the request.

19 **REQUEST FOR ADMISSION NO. 454:**

20 Admit that for at least 60 of the 126 URLs listed in Norman Zada's
21 COMMUNICATION dated November 18 2004 (control numbered PG_DMCA0376-
22 0384) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
23 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 454**

25 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
26 Perfect 10 stated that some of the infringed images may be found in the specified

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51320/2624735.751320/262

4735.751320/2624735

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1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 455:**

4 Admit that for at least 21 of the 126 URLs listed in Norman Zada's
5 COMMUNICATION dated November 18, 2004 (control numbered PG_DMCA0376-
6 0384) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
7 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
8 URLs.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 455**

10 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
11 Perfect 10 stated that some of the infringed images may be found in the specified
12 page range, not that all of the images in that page range were infringed at a particular
13 URL. On that basis, Perfect 10 denies the request.

14 **REQUEST FOR ADMISSION NO. 456:**

15 Admit that for at least 60 of the 126 URLs listed in Norman Zada's
16 COMMUNICATION dated November 18, 2004 (control numbered PG_DMCA0376-
17 0384) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
18 MATERIAL YOU claim was infringed at each of those URLs. RESPONSE TO

19 **REQUEST FOR ADMISSION NO 456**

20 Objection: Vague and ambiguous., mischaracterizes Perfect 10's notice.
21 Perfect 10's notice indicated that Google could find a representative sample of
22 infringed images of Amy Weber on amyweber.net, not that the entirety of
23 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
24 denies the request.

25 **REQUEST FOR ADMISSION NO. 462:**

26 Admit that for at least 150 of the 208 URLs listed in Norman Zada's
27 COMMUNICATION dated November 26, 2004 (control numbered PG_DMCA0389-

1 0401) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
2 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 462**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 463:**

9 Admit that for at least 20 of the 208 URLs listed in Norman Zada's
10 COMMUNICATION dated November 26, 2004 (control numbered PG_DMCA0389-
11 0401) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
12 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
13 URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 463**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10 stated that some of the infringed images may be found in the specified
17 page range, not that all of the images in that page range were infringed at a particular
18 URL. On that basis, Perfect 10 denies the request.

19 **REQUEST FOR ADMISSION NO. 464:**

20 Admit that for at least 42 of the 208 URLs listed in Norman Zada's
21 COMMUNICATION dated November 26, 2004 (control numbered PG_DMCA0389-
22 0401) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
23 MATERIAL YOU claim was infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 464**

25 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
26 Perfect 10's notice indicated that Google could find a representative sample of
27 infringed images of Amy Weber on amyweber.net, not that the entirety of

1 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
2 denies the request.

3 **REQUEST FOR ADMISSION NO. 465:**

4 Admit that for one or more of the URLs listed in Norman Zada's
5 COMMUNICATION dated November 26, 2004 (control numbered PG_DMCA0389-
6 0401) YOU identified perfect10.com, as the ALLEGED COPYRIGHTED
7 MATERIAL YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 465**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
11 that the entirety of perfect10.com, was being infringed at a particular URL. On this
12 basis, Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 471:**

14 Admit that for at least 90 of the 144 URLs listed in Norman Zada's
15 COMMUNICATION dated December 1, 2004 (control numbered
16 PG_DMCA0411_A_01-09 and PG_DMCA_A14) YOU identified MULTIPLE pages
17 in Perfect 10 Magazine as the ALLEGED COPYRIGHTED MATERIAL YOU claim
18 was infringed at each of those URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 471**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that some of the infringed images may be found in the specified
22 page range, not that all of the images in that page range were infringed at a particular
23 URL. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 472:**

25 Admit that for at least 26 of the 144 URLs listed in Norman Zada's
26 COMMUNICATION dated December 1, 2004 (control numbered
27 PG_DMCA0411_A_01-09 and PG_DMCA_A_14) YOU identified a seven-page

1 section of an issue of Perfect 10 Magazine as the ALLEGED COPYRIGHTED
2 MATERIAL YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 472**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 473:**

9 Admit that for at least 47 of the 144 URLs listed in Norman Zada's
10 COMMUNICATION dated December 1, 2004 (control numbered
11 PG_DMCA0411_A_01-09 and PG_DMCA_A_14) YOU identified amyweber.net as
12 the ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of
13 those URLs.

14 **RESPONSE TO REQUEST FOR ADMISSION NO 473**

15 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
16 Perfect 10's notice indicated that Google could find a representative sample of
17 infringed images of Amy Weber on amyweber.net, not that the entirety of
18 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
19 denies the request.

20 **REQUEST FOR ADMISSION NO. 474:**

21 Admit that for one or more of the URLs listed in Norman Zada's
22 COMMUNICATION dated December 1, 2004 (control numbered
23 PG_DMCA0411_A_01-09 and PG_DMCA_A_14) YOU identified perfect10.com as
24 the ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of
25 those URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 474**

27

51320/2624735.751320/262

4735.751320/2624735

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
3 that the entirety of perfect10.com, was being infringed at a particular URL. On this
4 basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 480:**

6 Admit that for at least 98 of the 151 URLs listed in Norman Zada's
7 COMMUNICATION dated December 9, 2004 (control numbered
8 PG_DMCA0411_B_01-09 and PG_DMCA_B_15) YOU identified MULTIPLE
9 pages in Perfect 10 'Magazine as the ALLEGED COPYRIGHTED MATERIAL
10 YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 480**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that some of the infringed images may be found in the specified
14 page range, not that all of the images in that page range were infringed at a particular
15 URL. On that basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 481:**

17 Admit that for at least 27 of the 151 URLs listed in Norman Zada's
18 COMMUNICATION dated December 9, 2004 (control numbered
19 PG_DMCA0411_B_01-09 and PG_DMCA_B_15) YOU identified a seven-page
20 section of an issue of Perfect 10 Magazine as the ALLEGED COPYRIGHTED
21 MATERIAL YOU claim was infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 481**

23 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
24 Perfect 10 stated that some of the infringed images may be found in the specified
25 page range, not that all of the images in that page range were infringed at a particular
26 URL. On that basis, Perfect 10 denies the request.

27 **REQUEST FOR ADMISSION NO. 482:**

1 Admit that for at least 98 of the 151 URLs listed in Norman Zada's
2 COMMUNICATION dated December 9, 2004 (control numbered
3 PG_DMCA0411_B_01-09 and PG_DMCA_B_15) YOU identified amyweber.net as
4 the ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of
5 those URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO 482**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10's notice indicated that Google could find a representative sample of
9 infringed images of Amy Weber on amyweber.net, not that the entirety of
10 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
11 denies the request.

12 **REQUEST FOR ADMISSION NO. 488:**

13 Admit that for at least 112 of the 163 URLs listed in Norman Zada's
14 COMMUNICATION dated December 21, 2004 (control numbered PG_DMCA0412-
15 0422) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
16 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 488**

18 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
19 Perfect 10 stated that some of the infringed images may be found in the specified
20 page range, not that all of the images in that page range were infringed at a particular
21 URL. On that basis, Perfect 10 denies the request.

22 **REQUEST FOR ADMISSION NO. 489:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated December 21, 2004 (control numbered PG_DMCA0412-
25 0422) YOU identified a 24-page section of an issue of Perfect 10 Magazine as the
26 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
27 URLs.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 489**

2 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
3 Perfect 10 stated that some of the infringed images may be found in the specified
4 page range, not that all of the images in that page range were infringed at a particular
5 URL. On that basis, Perfect 10 denies the request.

6 **REQUEST FOR ADMISSION NO. 492:**

7 Admit that for at least 46 of the 163 URLs listed in Norman Zada's
8 COMMUNICATION dated December 21, 2004 (control numbered PG_DMCA0412-
9 0422) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
10 MATERIAL YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION. NO. 492**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10's notice indicated that Google could find a representative sample of
14 infringed images of Amy Weber on amyweber.net, not that the entirety of
15 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
16 denies the request.

17 **REQUEST FOR ADMISSION NO. 493:**

18 Admit that for one or more of the URLs listed in Norman Zada's
19 COMMUNICATION dated December 21, 2004 (control numbered PG_DMCA0412-
20 0422) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
21 MATERIAL YOU claim was infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 493**

23 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
24 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
25 that the entirety of perfect10.com, was being infringed at a particular URL. On this
26 basis, Perfect 10 denies the request.

27 **REQUEST FOR ADMISSION NO. 499:**

1 Admit that for at least 112 of the 147 URLs listed in Norman Zada's
2 COMMUNICATION dated December 27, 2004 (control numbered PG_DMCA0428-
3 0437) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
4 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 499**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that some of the infringed images may be found in the specified
8 page range, not that all of the images in that page range were infringed at a particular
9 URL. On that basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 500:**

11 Admit that for at least 31 of the 147 URLs listed in Norman Zada's
12 COMMUNICATION dated December 27, 2004 (control numbered PG_DMCA0428-
13 0437) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
14 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
15 URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 500**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10 stated that some of the infringed images may be found in the specified
19 page range, not that all of the images in that page range were infringed at a particular
20 URL. On that basis, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 501:**

22 Admit that for at least 28 of the 147 URLs listed in Norman Zada's
23 COMMUNICATION dated December 27, 2004 (control numbered PG_DMCA0428-
24 0437) YOU identified amyweber.net as the ALLEGED COPYRIGHTED-
25 MATERIAL YOU claim was infringed at each of those URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 501**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10's notice indicated that Google could find a representative sample of
3 infringed images of Amy Weber on amyweber.net, not that the entirety of
4 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
5 denies the request.

6 **REQUEST FOR ADMISSION NO. 502:**

7 Admit that for one or more of the URLs listed in Norman Zada's
8 COMMUNICATION dated December 27, 2004 (control numbered PG_DMCA0428-
9 0437) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
10 MATERIAL YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 502**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
14 that the entirety of perfect10.com was being infringed at a particular URL. On this
15 basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 508:**

17 Admit that for at least 80 of the 107 URLs listed in Norman Zada's
18 COMMUNICATION dated December 29, 2004 (control numbered PG_DMCA0446-
19 0454) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
20 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 508**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 509:**

1 Admit that for at least 18 of the 107 URLs listed in Norman Zada's
2 COMMUNICATION dated December 29, 2004 (control numbered PG_DMCA0446-
3 0454) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 509**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed- at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 510:**

12 Admit that for at least 21 of the 107 URLs listed in Norman Zada's
13 COMMUNICATION dated December 29, 2004 (control numbered PG_DMCA0446-
14 0454) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
15 MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 510**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10's notice indicated that Google could find a representative sample of
19 'infringed images of Amy Weber on amyweber.net, not that the entirety of
20 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 511:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated December 29, 2004 (control numbered PG_DMCA0446-
25 0454) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 511**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that the images may be found in many cases on perfect10.com not
3 that the entirety of perfect10.com was being infringed at a particular URL. On this
4 basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 518:**

6 Admit that for at least 17 of the 91 URLs listed in Norman Zada's
7 COMMUNICATION dated December 31, 2004 (control numbered PG_DMCA0462-
8 0470) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
9 MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 518**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10's notice indicated that Google could find a representative sample of
13 infringed images of Amy Weber on amyweber.net, not that the entirety of
14 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
15 denies the request.

16 **REQUEST FOR ADMISSION NO. 523:**

17 Admit that for at least 123 of the 149 URLs listed in Norman Zada's
18 COMMUNICATION dated January 3, 2005 (control numbered PG_DMCA0485-
19 0495) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
20 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 523**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 524:**

27

1 Admit that for at least 6 of the 149 URLs listed in Norman Zada's
2 COMMUNICATION dated January 3, 2005 (control numbered PG_DMCA0485-
3 0495) YOU identified a ten-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 524**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 525:**

12 Admit that for at least 25 of the 149 URLs listed in Norman Zada's
13 COMMUNICATION dated January 3, 2005 (control numbered PG_DMCA0485-
14 0495) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
15 MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 525**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10's notice indicated that Google could find a representative sample of
19 infringed images of Amy Weber on amyweber.net, not that the entirety of
20 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 530:**

23 Admit that for at least 142 of the 158 URLs listed in Norman Zada's
24 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
25 0521) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
26 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 530**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 531:**

6 Admit that for at least 26 of the 158 URLs listed in Norman Zada's
7 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
8 0521) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
9 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
10 URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 531**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that some of the infringed images may be found in the specified
14 page range, not that all of the images in that page range were infringed at a particular
15 URL. On that basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 532:**

17 Admit that for at least 14 of the 158 URLs listed in Norman Zada's
18 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
19 0521) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
20 MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 532**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10's notice indicated that Google could find a representative sample of
24 infringed images of Amy Weber on amyweber.net, not that the entirety of
25 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
26 denies the request.

27 **REQUEST FOR ADMISSION NO. 533:**

1 Admit that for one or more of the URLs listed in Norman Zada's
2 COMMUNICATION dated January 16, 2005 (control numbered PG_DMCA0512-
3 0521) YOU identified perfect perfect10.com as the ALLEGED COPYRIGHTED
4 MATERIAL YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 533**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
8 that the entirety of perfect10.com was being infringed at a particular URL. On this
9 basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 541:**

11 Admit that for at least 112 of the 131 URLs listed in Norman Zada's
12 COMMUNICATION dated January 21, 2005 (control numbered PG_DMCA0531-
13 0539) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
14 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 541**

16 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
17 Perfect 10 stated that some of the infringed images may be found in the specified
18 page range, not that all of the images in that page range were infringed at a particular
19 URL. On that basis, Perfect 10 denies the request.

20 **REQUEST FOR ADMISSION NO. 542:**

21 Admit that for at least 18 of the 131 URLs listed in Norman Zada's
22 COMMUNICATION dated January 21, 2005 (control numbered PG_DMCA0531-
23 0539) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
24 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
25 URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 542**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 543:**

6 Admit that for at least 17 of the 131 URLs listed in Norman Zada's
7 COMMUNICATION dated January 21, 2005 (control numbered PG_DMCA0531-
8 0539) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
9 MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 543**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10's notice indicated that Google could find a representative sample of
13 infringed images of Amy Weber on amyweber.net, not that the entirety of
14 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
15 denies the request.

16 **REQUEST FOR ADMISSION NO. 544:**

17 Admit that for one or more of the URLs listed in Norman Zada's
18 COMMUNICATION dated January 21, 2005 (control numbered PG_DMCA0531-
19 0539) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
20 MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 544**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
24 that the entirety of perfect10.com was being infringed at a particular URL. On this
25 basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 549:**

1 Admit that for at least 128 of the 165 URLs listed in Norman Zada's
2 COMMUNICATION dated January 25, 2005 (control numbered GGL000778-
3 000782) YOU identified MULTIPLE pages in Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 549**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 550:**

12 Admit that for at least 15 of the 165 URLs listed in Norman Zada's
13 COMMUNICATION dated January 25, 2005 (control numbered GGL000778-
14 000782) YOU identified a seven-page section of an issue of Perfect 10 Magazine as
15 the ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of
16 those URLs.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 550**

18 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
19 Perfect 10 stated that some of the infringed images may be found in the specified
20 page range, not that all of the images in that page range were infringed at a particular
21 URL. On that basis, Perfect 10 denies the request.

22 **REQUEST FOR ADMISSION NO. 551:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated January 25, 2005 (control numbered GGL000778-
25 000782) YOU identified ambersmith.net as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 551**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10's notice indicated that Google could find a representative sample of
3 infringed images of Amber Smith on ambersmith.net, not that the entirety of
4 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
5 denies the request.

6 **REQUEST FOR ADMISSION NO. 552:**

7 Admit that for at least 28 of the 165 URLs listed in Norman Zada's
8 COMMUNICATION dated January 25, 2005 (control numbered GGL000778-
9 000782) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
10 MATERIAL YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 552**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10's notice indicated that Google could find a representative sample of
14 infringed images of Amy Weber on amyweber.net, not that the entirety of
15 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
16 denies the request.

17 **REQUEST FOR ADMISSION NO. 558:**

18 Admit that for at least 76 of the 95 URLs listed in Norman Zada's
19 COMMUNICATION dated February 3, 2005 (control numbered PG_DMCA0560-
20 0568) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
21 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 558**

23 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
24 Perfect 10 stated that some of the infringed images may be found in the specified
25 page range, not that all of the images in that page range were infringed at a particular
26 URL. On that basis, Perfect 10 denies the request.

27 **REQUEST FOR ADMISSION NO. 559:**

1 Admit that for at least 10 of the 95 URLs listed in Norman Zada's
2 COMMUNICATION dated February 3, 2005 (control numbered PG_DMCA0560-
3 0568) YOU identified a ten-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 559**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 560:**

12 Admit that for at least 13 of the 95 URLs listed in Norman Zada's
13 COMMUNICATION dated February 3, 2005 (control numbered PG_DMCA0560-
14 0568) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
15 MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 560**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 1.0's notice.
18 Perfect 10's notice indicated that Google could find a representative sample of
19 infringed images of Amy Weber on amyweber.net, not that the entirety of
20 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 561:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated February 3, 2005 (control numbered PG_DMCA0560-
25 0568) YOU identified ambersmith.net as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 561**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10's notice indicated that Google could find a representative sample of
3 infringed images of Amber Smith on ambersmith.net, not that the entirety of
4 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
5 denies the request.

6 **REQUEST FOR ADMISSION NO. 562:**

7 Admit that for one or more of the URLs listed in Norman Zada's
8 COMMUNICATION dated February 3, 2005 (control numbered PG_DMCA0560-
9 0568) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
10 MATERIAL YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 562**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
14 that the entirety of perfect10.com was being infringed at a particular URL. On this
15 basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 567:**

17 Admit that for at least 230 of the 289 URLs listed in Norman Zada's
18 COMMUNICATION dated February 7, 2005 (control numbered PG_DMCA0574-
19 0587) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
20 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 567**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 568:**

1 Admit that for at least 35 of the 289 URLs listed in Norman Zada's
2 COMMUNICATION dated February 7, 2005 (control numbered PG_DMCA0574-
3 0587) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 568**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 569:**

12 Admit that for at least 56 of the 289 URLs listed in Norman Zada's
13 COMMUNICATION dated February 7, 2005 (control numbered PG_DMCA0574-
14 0587) YOU identified as the ALLEGED COPYRIGHTED MATERIAL YOU claim
15 was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO 569**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10's notice indicated that Google could find a representative sample of
19 infringed images of Amy Weber on amyweber.net, not that the entirety of
20 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 570:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated February 7, 2005 (control numbered PG_DMCA0574-
25 0587) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 570**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
3 that the entirety of perfect10.com was being infringed at a particular URL. On this
4 basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 576:**

6 Admit that for at least 161 of the 226 URLs listed in Norman Zada's
7 COMMUNICATION dated February 11, 2005 (control numbered PG_DMCA0592-
8 0603) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
9 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 576**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10 stated that some of the infringed images may be found in the specified
13 page range, not that all of the images in that page range were infringed at a particular
14 URL. On that basis, Perfect 10 denies the request.

15 **REQUEST FOR ADMISSION NO. 577:**

16 Admit that for at least 25 of the 226 URLs listed in Norman Zada's
17 COMMUNICATION dated February 11, 2005 (control numbered PG_DMCA0592-
18 0603) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
19 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
20 URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 577**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 578:**

27

1 Admit that for at least 50 of the 226 URLs listed in Norman Zada's
2 COMMUNICATION dated February 11, 2005 (control numbered PG_DMCA0592-
3 0603) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
4 MATERIAL YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 578**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10's notice indicated that Google could find a representative sample of
8 infringed images of Amy Weber on amyweber.net, not that the entirety of
9 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
10 denies the request.

11 **REQUEST FOR ADMISSION NO. 579:**

12 Admit that for at least 10 of the 226 URLs listed in Norman Zada's
13 COMMUNICATION dated February 11, 2005 (control numbered PG_DMCA0592-
14 0603) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
15 MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 579**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
19 that the entirety of perfect10.com, was being infringed at a particular URL. On this
20 basis, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 585:**

22 Admit that for at least 203 of the 276 URLs listed in Norman Zada's
23 COMMUNICATION dated February 17, 2005 (control numbered PG_DMCA0608-
24 0620) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
25 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 585**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range,. not that all of the images in that page range were infringed at a
4 particular URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 586:**

6 Admit that at least 19 of the 276 URLs listed in Norman Zada's
7 COMMUNICATION dated February 17, 2005 (control numbered PG_DMCA0608-
8 0620) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
9 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
10 URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 586**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that some of the infringed images may be found in the specified
14 page range, not that all of the images in that page range were infringed at a particular
15 URL. On that basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 587:**

17 Admit that for at least 35 of the 276 URLs listed in Norman Zada's
18 COMMUNICATION dated February 17, 2005 (control numbered PG_DMCA0608-
19 0620) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
20 MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 587**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10's notice indicated that Google could find a representative sample of
24 infringed images of Amy Weber on amyweber.net, not that the entirety of
25 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
26 denies the request.

27 **REQUEST FOR ADMISSION NO. 588:**

1 Admit that for at least 31 of the 276 URLs listed in Norman Zada's
2 COMMUNICATION dated February 17, 2005 (control numbered PG_DMCA0608-
3 0620) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
4 MATERIAL YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 588**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
8 that the entirety of perfect10.com, was being infringed at a particular URL. On this
9 basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 593:**

11 Admit that for at least 225 of the 368 URLs listed in Norman Zada's
12 COMMUNICATION dated March 6, 2005 (control numbered PG_DMCA0621-
13 0636) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
14 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 593**

16 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
17 Perfect 10 stated that some of the infringed images may be found in the specified
18 page range, not that all of the images in that page range were infringed at a particular
19 URL. On that basis, Perfect 10 denies the request.

20 **REQUEST FOR ADMISSION NO. 594:**

21 Admit that for one or more of the. URLs listed in Norman Zada's
22 COMMUNICATION dated March 6, 2005 (control numbered PG_DMCA0621-
23 0636) YOU identified a nine-page section of an issue of Perfect 10 Magazine as the
24 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
25 URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 594**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 595:**

6 Admit that for at least 56 of the 368 URLs listed in Norman Zada's
7 COMMUNICATION dated March 6, 2005 (control numbered PG_DMCA0621-
8 0636) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
9 MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 595**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10's notice indicated that Google could find a representative sample of
13 infringed images of Amy Weber on amyweber.net, not that the entirety of
14 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
15 denies the request.

16 **REQUEST FOR ADMISSION NO. 596:**

17 Admit that for at least 28 of the 368 URLs listed in Norman Zada's
18 COMMUNICATION dated March 6, 2005 (control numbered PG_DMCA0621-
19 0636) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
20 MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 596**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect. 10 stated that the images may be found in many cases on perfect10.com, not
24 that the entirety of perfect10.com was being infringed at a particular URL. On this
25 basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 601:**

27

1 Admit that for at least 172 of the 215 URLs listed in Norman Zada's
2 COMMUNICATION dated April 3, 2005 (control numbered PG_DMCA0637-0652)
3 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
4 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 601**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that some of the infringed images may be found in the specified
8 page range, not that all of the images in that page range were infringed at a particular
9 URL. On that basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 602:**

11 Admit that for at least 38 of the 215 URLs listed in Norman Zada's
12 COMMUNICATION dated April 3, 2005 (control numbered PG_DMCA0637-0652)
13 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
14 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
15 URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 602**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10 stated that some of the infringed images may be found in the specified
19 page range, not that all of the images in that page range were infringed at a particular
20 URL. On that basis, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 603:**

22 Admit that for at least 23 of the 215 URLs listed in Norman Zada's
23 COMMUNICATION dated April 3, 2005 (control numbered PG_DMCA0637-0652)
24 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
25 YOU claim was infringed at each of those URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 603**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10's notice indicated that Google could find a representative sample of
3 infringed images of Amy Weber on amyweber.net, not that the entirety of
4 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
5 denies the request.

6 **REQUEST FOR ADMISSION NO. 604:**

7 Admit that for one or more of the URLs listed in Norman Zada's
8 COMMUNICATION dated April 3, 2005 (control numbered PG_DMCA0637-0652)
9 YOU identified perfect 10.com as the ALLEGED COPYRIGHTED MATERIAL
10 YOU claim was infringed at each of those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 604**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that the images may be found in many cases on perfect10.com not
14 that the entirety of perfect10.com was being infringed at a particular URL. On this
15 basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 609:**

17 Admit that for at least 212 of the 266 URLs listed in Norman Zada's
18 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
19 0668) YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
20 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 609**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 610:**

1 Admit that for at least 22 of the 266 URLs listed in Norman Zada's
2 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
3 0668) YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
4 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
5 URLs.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 610**

7 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
8 Perfect 10 stated that some of the infringed images may be found in the specified
9 page range, not that all of the images in that page range were infringed at a particular
10 URL. On that basis, Perfect 10 denies the request.

11 **REQUEST FOR ADMISSION NO. 611:**

12 Admit that for at least 41 of the 266 URLs listed in Norman Zada's
13 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
14 0668) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
15 MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 611**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10's notice indicated that Google could find a representative sample of
19 infringed images of Amy Weber on amyweber.net, not that the entirety of
20 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
21 denies the request.

22 **REQUEST FOR ADMISSION NO. 612:**

23 Admit that for at least 12 of the 266 URLs listed in Norman Zada's
24 COMMUNICATION dated April 11, 2005 (control numbered PG_DMCA0653-
25 0668) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 612**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
3 that the entirety of perfect10.com was being infringed at a particular URL. On this
4 basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 620:**

6 Admit that for at least 64 of the 82 URLs listed in Norman Zada's
7 COMMUNICATION dated May 1, 2005 (control numbered PG_DMCA0669-0676)
8 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
9 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 620**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10 stated that some of the infringed images may be found in the specified
13 page range, not that all of the images in that page range were infringed at a particular
14 URL. On that basis, Perfect 10 denies the request.

15 **REQUEST FOR ADMISSION NO. 621:**

16 Admit that for at least 7 of the 82 URLs listed in Norman Zada's
17 COMMUNICATION dated May 1, 2005 (control numbered PG_DMCA0669-0676)
18 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
19 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
20 URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 621**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10 stated that some of the infringed images may be found in the specified
24 page range, not that all of the images in that page range were infringed at a particular
25 URL. On that basis, Perfect 10 denies the request.

26 **REQUEST FOR ADMISSION NO. 622:**

27

51320/2624735.751320/262

4735.751320/2624735

1 Admit that for at least 15 of the 82 URLs listed in Norman Zada's
2 COMMUNICATION dated May 1, 2005 (control numbered PG_DMCA06669-0676)
3 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
4 YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 622**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10's notice indicated that Google could find a representative sample of
8 infringed images of Amy Weber on amyweber.net, not that the entirety of
9 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
10 denies the request.

11 **REQUEST FOR ADMISSION NO. 627:**

12 Admit that for at least 110 of the URLs listed in Norman Zada's
13 COMMUNICATION dated May 7, 2005 (control numbered PG_DMCA0677-0686)
14 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
15 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 627**

17 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
18 Perfect 10 stated that some of the infringed images maybe found in the specified page
19 range, not that all of the images in that page range were infringed at a particular URL.
20 On that basis, Perfect 10 denies the request.

21 **REQUEST FOR ADMISSION NO. 628:**

22 Admit that for at least 10 of the URLs listed in Norman Zada's
23 COMMUNICATION dated May 7, 2005 (control numbered PG_DMCA0677-0686)
24 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
25 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
26 URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 628**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 629:**

6 Admit that for one or more of the URLs listed in Norman Zada's
7 COMMUNICATION dated May 7, 2005 (control numbered PG_DMCA0677-0686)
8 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
9 YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 629**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10's notice indicated that Google could find a representative sample of
13 infringed images of Amy Weber on amyweber.net, not that the entirety of
14 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
15 denies the request.

16 **REQUEST FOR ADMISSION NO. 633:**

17 Admit that for at least 36 of the 294 URLs listed in Norman Zada's
18 COMMUNICATION dated June 12, 2005 (control numbered PG_DMCA0693-0707)
19 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
20 YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 633**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10's notice indicated that Google could find a representative sample of
24 infringed images of Amy Weber on amyweber.net, not that the entirety of
25 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
26 denies the request.

27 **REQUEST FOR ADMISSION NO. 634:**

1 Admit that for at least 65 of the 294 URLs listed in Norman Zada's
2 COMMUNICATION dated June 12, 2005 (control numbered PG_DMCA0693-0707)
3 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
4 YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 634**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
8 that the entirety of perfect10.com was being infringed at a particular URL. On this.
9 basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 636:**

11 Admit that for at least 160 of the 294 URLs listed in Norman Zada's
12 COMMUNICATION dated June 12, 2005 (control numbered PG_DMCA0693-0707)
13 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
14 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 636**

16 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
17 Perfect 10 stated that some of the infringed images may be found in the specified
18 page range, not that all of the images in that page range were infringed at a particular
19 URL. On that basis, Perfect 10 denies the request.

20 **REQUEST FOR ADMISSION NO. 637:**

21 Admit that for one at least 10 of the 294 URLs listed in Norman Zada's
22 COMMUNICATION dated June 12, 2005 (control numbered PG_DMCA0693-0707)
23 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
24 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
25 URLs.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 637**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10 stated that some of the infringed images may be found in the specified
3 page range, not that all of the images in that page range were infringed at a particular
4 URL. On that basis, Perfect 10 denies the request.

5 **REQUEST FOR ADMISSION NO. 638:**

6 Admit that for one or more of the URLs listed in Norman Zada's
7 COMMUNICATION dated June 12, 2005 (control numbered PG_DMCA0693-0707)
8 YOU identified ambersmith.net as the ALLEGED COPYRIGHTED MATERIAL
9 YOU claim was infringed at each of those URLs.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 638**

11 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
12 Perfect 10's notice indicated that Google could find a representative sample of
13 infringed images of Amber Smith on ambersmith.net, not that the entirety of
14 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
15 denies the request.

16 **REQUEST FOR ADMISSION NO. 642:**

17 Admit that for one or more of the URLs listed in Norman Zada's
18 COMMUNICATION dated June 19, 2005 (control numbered GGL000745-000752)
19 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
20 YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 642**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10's notice indicated that Google could find a representative sample of
24 infringed images of Amy Weber on amyweber.net, not that the entirety of
25 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
26 denies the request.

27 **REQUEST FOR ADMISSION NO. 643:**

1 Admit that for at least 63 of the 123 URLs listed in Norman Zada's
2 COMMUNICATION dated June 19, 2005 (control numbered GGL000745-000752)
3 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
4 YOU claim was infringed at each of those URLs.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 643**

6 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
7 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
8 that the entirety of perfect10.com was being infringed at a particular URL. On this
9 basis, Perfect 10 denies the request.

10 **REQUEST FOR ADMISSION NO. 645:**

11 Admit that for at least 52 of the URLs listed in Norman Zada's
12 COMMUNICATION dated June 19, 2005 (control numbered GGL000745-00075)
13 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
14 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 645**

16 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
17 Perfect 10 stated that some of the infringed images may be found in the specified
18 page range, not that all of the images in that page range were infringed at a particular
19 URL. On that basis, Perfect 10 denies the request.

20 **REQUEST FOR ADMISSION NO. 646:**

21 Admit that for one or more of the URLs listed in Norman Zada's
22 COMMUNICATION dated June 19, 2005 (control numbered GGL000745-00075)
23 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
24 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 646**

26 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
27 Perfect 10 stated that some of the infringed images may be found in the specified

1 page range, not that all of the images in that page range were infringed at a particular
2 URL. On that basis, Perfect 10 denies the request.

3 **REQUEST FOR ADMISSION NO. 651:**

4 Admit that for at least 270 of the 485 URLs listed in Norman Zada's
5 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)
6 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
7 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 651**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10 stated that some of the infringed images may be found in the specified
11 page range, not that all of the images in that page range were infringed at a particular
12 URL. On that basis, Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 652:**

14 Admit that for one or more of the URLs listed in Norman Zada's
15 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)
16 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
17 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
18 URLs.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 652**

20 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
21 Perfect 10 stated that some of the infringed images may be found in the specified
22 page range, not that all of the images in that page range were infringed at a particular
23 URL. On that basis, Perfect 10 denies the request.

24 **REQUEST FOR ADMISSION NO. 653:**

25 Admit that for at least 131 of the 485 URLs listed in Norman Zada's
26 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)

1 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
2 YOU claim was infringed at each of those URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 653**

4 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
6 that the entirety of perfect10.com was being infringed at a particular URL. On this
7 basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 654:**

9 Admit that for at least 43 of the 485 URLs listed in Norman Zada's
10 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)
11 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
12 YOU claim was infringed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 654**

14 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
15 Perfect 10's notice indicated that Google could find a representative sample of
16 infringed images of Amy Weber on amyweber.net, not that the entirety of
17 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
18 denies the request.

19 **REQUEST FOR ADMISSION NO. 655:**

20 Admit that for one or more of the URLs listed in Norman Zada's
21 COMMUNICATION dated July 16, 2005 (control numbered GGL005781-5798)
22 YOU identified ambersmith.net as the ALLEGED COPYRIGHTED MATERIAL
23 YOU claim was infringed at each of those URLs.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 655**

25 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
26 Perfect 10's notice indicated that Google could find a representative sample of
27 infringed images of Amber Smith on ambersmith.net, not that the entirety of

1 ambersmith.net was being infringed at a particular URL. On that basis, Perfect 10
2 denies the request.

3 **REQUEST FOR ADMISSION NO. 664:**

4 Admit that for at least 75 of the 200 URLs listed in Norman Zada's
5 COMMUNICATION dated July 26, 2005 (control numbered GGL001351-1361)
6 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
7 YOU claim was infringed at each of those URLs.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 664**

9 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
10 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
11 that the entirety of perfect10.com was being infringed at a particular URL. On this
12 basis, Perfect 10 denies the request.

13 **REQUEST FOR ADMISSION NO. 666:**

14 Admit that for at least 123 of the URLs listed in Norman Zada's
15 COMMUNICATION dated July 26, 2005 (control numbered GGL001351-1361)
16 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
17 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 666**

19 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
20 Perfect 10 stated that some of the infringed images may be found in the specified
21 page range, not that all of the images in that page range were infringed at a particular
22 URL. On that basis, Perfect 10 denies the request.

23 **REQUEST FOR ADMISSION NO. 667:**

24 Admit that for one or more of the URLs listed in Norman Zada's
25 COMMUNICATION dated July 26, 2005 (control numbered GGL001351-1361)
26 YOU identified an eight-page section of an issue of Perfect 10 Magazine as the

1 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
2 URLs.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 667**

4 Objection: Vague and ambiguous; mischaracterizes Perfect 10's notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that all of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.

8 **REQUEST FOR ADMISSION NO. 671:**

9 Admit that for at least 109 of the 278 URLs listed in Norman Zada's
10 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
11 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
12 YOU claim was infringed at each of those URLs.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 671**

14 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
15 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
16 that the entirety of perfect10.com was being infringed at a particular URL. On this
17 basis, Perfect 10 denies the request.

18 **REQUEST FOR ADMISSION NO. 673:**

19 Admit that for at least 62 of the 278 URLs listed in Norman Zada's
20 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
21 YOU identified MULTIPLE pages in Perfect 10 Magazine as the ALLEGED
22 COPYRIGHTED MATERIAL YOU claim was infringed at each of those URLs.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 673**

24 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
25 Perfect 10 stated that some of the infringed images may be found in the specified
26 page range, not that all of the images in that page range were infringed at a particular
27 URL. On that basis, Perfect 10 denies the request.

1 **REQUEST FOR ADMISSION NO. 674:**

2 Admit that for at least 10 of the 278 URLs listed in Norman Zada's
3 COMMUNICATION dated August 30, 2005 (control numbered GGL005305-5312)
4 YOU identified a seven-page section of an issue of Perfect 10 Magazine as the
5 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
6 URLs.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 674**

8 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
9 Perfect 10 stated that some of the infringed images may be found in the specified
10 page range, not that all of the images in that page range were infringed at a particular
11 URL. On that basis, Perfect 10 denies the request.

12 **REQUEST FOR ADMISSION NO. 689:**

13 Admit that for at least 151 of the 167 URLs listed in Norman Zada's
14 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
15 006207) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
16 MATERIAL YOU claim was infringed at each of those URLs.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 689**

18 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
19 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
20 that the entirety of perfect10.com was being infringed at a particular URL. On this
21 basis, Perfect 10 denies the request.

22 **REQUEST FOR ADMISSION NO. 690:**

23 Admit that for one or more of the URLs listed in Norman Zada's
24 COMMUNICATION dated December 7, 2005 (control numbered GGL006200-
25 006207) YOU identified amyweber.net as the ALLEGED COPYRIGHTED
26 MATERIAL YOU claim was infringed at each of those URLs.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 690**

1 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
2 Perfect 10's notice indicated that Google could find a representative sample of
3 infringed images of Amy Weber on amyweber.net, not that the entirety of
4 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
5 denies the request.

6 **REQUEST FOR ADMISSION NO. 715:**

7 Admit that for each of the 1181 URLs listed in Norman Zada's
8 COMMUNICATION dated February 13, 2006 (control numbered GGL006345-
9 006382) YOU identified perfect10.com as the ALLEGED COPYRIGHTED
10 MATERIAL YOU claim was infringed at those URLs.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 715**

12 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
13 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
14 that the entirety of perfect10.com was being infringed at a particular URL. On this
15 basis, Perfect 10 denies the request.

16 **REQUEST FOR ADMISSION NO. 749:**

17 Admit that for one or more of the URLs listed in Norman Zada's
18 COMMUNICATION dated April 24, 2007 (control numbered GGL032075-032096),
19 YOU identified amyweber.net as the ALLEGED COPYRIGHTED MATERIAL
20 YOU claim was infringed at each of those URLs.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 749**

22 Objection: Vague and ambiguous, mischaracterizes Perfect 10's notice.
23 Perfect 10's notice indicated that Google could find a representative sample of
24 infringed images of Amy Weber on amyweber.net, not that the entirety of
25 amyweber.net was being infringed at a particular URL. On that basis, Perfect 10
26 denies the request.

1 **B. GOOGLE’S POSITION :**

2 Perfect 10's responses to these 229 Requests are evasive and inadequate.
3 Of those, 136 seek to determine Perfect 10’s position as to what information it
4 included in its 72 alleged DMCA communications to Google, including what
5 allegedly copyrighted material (if any) it identified as being infringed in its purported
6 notices. This is critical information because if Perfect 10's notices failed to
7 adequately identify “the copyrighted work claimed to have been infringed,” they were
8 deficient as a matter of law. 17 U.S.C. § 512(c)(3)(A)(ii).

9 The other 93 Requests seek equally important clarification as to the
10 nature of the claims Perfect 10 is asserting against Google, and Perfect 10’s
11 contentions regarding the damages it claims to have suffered as a result. As
12 described above, such requests are necessary to determine the scope of Perfect 10’s
13 case, and were expressly endorsed by Judge Matz.

14 For each of these 229 Requests, Perfect 10 fails to address the subject
15 matter of the request and instead makes an evasive denial purportedly “on [the] basis”
16 of Perfect 10's objections to the wording of the request. Such responses are
17 insufficient under Rule 36, which states that “[a] denial must fairly respond to the
18 substance of the matter.” Fed. R. Civ. P. 36(a)(4); see also Herrera v. Scully, 143
19 F.R.D. 545, 549 (S.D.N.Y. 1992) (“A response to a request for admission is
20 inadequate when ... a responding party ... makes an evasive denial (i.e., one that
21 does not specifically deny the matter) ...”); Guinan v. A.I. duPont Hosp. for
22 Children, 2008 WL 938874, *1 (E.D.Pa. 2008) (“Answers that appear ... to go to the
23 accuracy of the requested admissions rather than the ‘essential truth’ contained
24 therein are impermissible and must be amended.”). Non-specific, evasive or
25 ambiguous responses that do not “specifically deny the matter” are improper and
26 must be amended or deemed admitted. Asea, 669 F.2d at 1245.

27 For example, Request No. 405 asks as follows:

1 “Admit that for one or more URLs listed in Norman Zada’s
2 COMMUNICATION dated July 11, 2004 (control numbered PG_DMCA0232-0245)
3 YOU identified perfect10.com as the ALLEGED COPYRIGHTED MATERIAL
4 YOU claim was infringed at each of those URLs.”

5 Perfect 10 did not respond directly, but instead stated:

6 “Objection: Vague and ambiguous, mischaracterizes Perfect 10’s notice.
7 Perfect 10 stated that the images may be found in many cases on perfect10.com, not
8 that the entirety of perfect10.com was being infringed at a particular URL. On this
9 basis, Perfect 10 denies the request.”

10 Perfect 10 cannot deny the request “on [that] basis.” Rule 36 obligates
11 Perfect 10 to admit or deny the request that Google has written. The request as
12 worded is quite simple. It asks whether Norman Zada’s July 11, 2004
13 communication to Google identified “perfect10.com” as the ALLEGED
14 COPYRIGHTED MATERIAL claimed to be infringed by one or more of the URLs
15 listed in that same communication. Whether “images may be found in many cases on
16 perfect10.com” is irrelevant to the request. Even whether any of the images at
17 perfect10.com are actually infringed by a URL in the July 11, 2004 communication is
18 irrelevant to the request. The Request merely asks Perfect 10 to admit that for one or
19 more of the URLs in that specific purported DMCA notice, the only identification of
20 ALLEGED COPYRIGHTED MATERIAL made by Perfect 10 was the text
21 “perfect10.com.” Perfect 10 need only review its own purported DMCA notice to
22 find the answer, and its evasive denial does not fairly respond to the substance of
23 Google’s Request for Admission.

24 Similarly, Request No. 354 asks:

25 “Admit that for one or more of the URLs listed in Norman Zada’s
26 COMMUNICATION dated June 1, 2004 (control numbered PG_DMCA0096-0102)
27 YOU identified a six-page section of an issue of Perfect 10 Magazine as the

1 ALLEGED COPYRIGHTED MATERIAL YOU claim was infringed at each of those
2 URLs.”

3 Perfect 10 responded:

4 “Objection: Vague and ambiguous, mischaracterizes Perfect 10’s notice.
5 Perfect 10 stated that some of the infringed images may be found in the specified
6 page range, not that *all* of the images in that page range were infringed at a particular
7 URL. On that basis, Perfect 10 denies the request.”

8 Perfect 10 cannot deny the Request based upon a possible inference that
9 could be drawn from a sufficient response to the Request. Google only asked Perfect
10 10 to admit that it identified a six-page section of an issue of Perfect 10 Magazine as
11 the material allegedly infringed by the URLs in its COMMUNICATION. Perfect
12 10’s evasive denial fails to address the matter requested.

13 None of Perfect 10’s responses to these 229 requests provide Google
14 with even a partial admission of the matter requested. “[A] reviewing court should
15 not permit a responding party to undermine the efficacy of the rule by creating
16 disingenuous, hair-splitting distinctions whose unarticulated goal is unfairly to burden
17 an opposing party.” Thalheim v. Eberheim, 124 F.R.D. 34, 35 (D. Conn.1988); see
18 also Poole v. Textron, 192 F.R.D. 494, 499 (D.Md. 2000). Because Perfect 10 denied
19 all of these 229 requests based on its objections to the wording of the request rather
20 than the truth of the matter asserted, the Court should order the requests admitted or
21 order Perfect 10 to amend its responses to specifically admit or deny the matters
22 requested.

23 **C. PERFECT 10’S POSITION :**

24 **Perfect 10 incorporates its preliminary statement (page 4, line 17 – page 7,**
25 **line 16) and the statement at p. 343, line 12 – p. 348, line 23 into this Section.**
26 ***Perfect 10 also incorporates Section III(C) into this section.***

1 As a threshold matter, this Court should not order Perfect 10 to amend any
2 requests in the first set of requests for admissions. As set forth above, Google
3 prematurely served the Joint Stipulation before Perfect 10 had an opportunity to
4 amend responses in the first set. Google should not be rewarded for its over-
5 aggressive conduct.

6 Google has *specifically* denied to the above requests for admissions in good
7 faith and has provided a good faith explanation for those denials. Google is
8 essentially asking that Perfect 10 remove all explanations or clarification provided by
9 Perfect 10 along with its denials. This addresses the same issues discussed above in
10 Perfect 10's Section III (c), the right to "explain, clarify or elucidate" its responses so
11 as not admit to, deny or create "half-truths." (Knowlton, 11 F.R.D 62, 66, supra.)

12 Not only should the denial "fairly meet[s] the substance of the request", but the
13 court should examine "(2) whether *good faith* requires that the denial be qualified:
14 and (3) whether any 'qualification' which has been supplied is a *good faith*
15 qualification." (Thalheim v. Eberheim, 124 F.R.D. 3d (D.Connecticut 1988)).
16 Perfect 10 chose to explain its denials to clarify the parties' disagreement on the
17 issues.

18 As Google points out, infra, "Indeed, a key purpose of Requests for Admission
19 is to determine the *responding party's* view and thereby ascertain what issues are or
20 are not in dispute."

21 **V. ISSUE NO. 4: SHOULD P10 BE ORDERED TO RESPOND TO**
22 **REQUESTS FOR ADMISSIONS FOR WHICH PERFECT 10**
23 **RESPONDED ONLY WITH WHAT GOOGLE ASSERTS ARE**
24 **IMPROPER OBJECTIONS?**

25 **A. THE REQUESTS AT ISSUE.**

26 **REQUEST FOR ADMISSION NO. 2:**

1 Admit that the perfect10.com website is a compilation, as defined by the
2 Copyright Act, 17 U.S.C. § 101.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

4 Objection: calls for a legal conclusion. Each of Perfect 10's photographs on the
5 website is a separate copyrighted work with independent economic value.

6 **REQUEST FOR ADMISSION NO. 3:**

7 Admit that the Perfect 10 Model of the Year Video (G-Rated), corresponding
8 to copyright registration number PA 776-1 73, is a compilation, as defined by the
9 Copyright Act, 17 U.S.C. § 101.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

11 Objection: calls for a legal conclusion.

12 **REQUEST FOR ADMISSION NO. 4:**

13 Admit that the Perfect 10 Model of the Year Video (R Rated), corresponding to
14 copyright registration number PA 955-019, is a compilation, as defined by the
15 Copyright Act, 17 U.S.C. § 101

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

17 Objection: calls for a legal conclusion.

18 **REQUEST FOR ADMISSION NO. 5:**

19 Admit that the Perfect 10 2000 Calendar, corresponding to copyright
20 registration number VA 987-612, is a compilation, as defined by the Copyright Act,
21 17 U.S.C. § 101.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

23 Objection: calls for a legal conclusion. Each of Perfect 10's photographs in the
24 calendar is a separate copyrighted work with independent economic value.

25 **REQUEST FOR ADMISSION NO. 11:**

26 Admit that GOOGLE does not generate any passwords to perfect10.com.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

1 Objection: This request is vague and ambiguous, because Perfect 10 does not
2 know what is meant by the word “generate.” Google does post Perfect 10 passwords
3 in its search results. Perfect 10 lacks knowledge and information sufficient to enable
4 it to further admit or deny this request; Google knows how it posts Perfect 10
5 passwords in its search results.

6 **REQUEST FOR ADMISSION NO. 17:**

7 Admit that GOOGLE does not index the password-protected area of
8 perfect10.com.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

10 Objection: Vague and ambiguous. Google does provide links to infringing
11 images which come from the password-protected area of perfect10.com. Perfect 10
12 lacks information and knowledge regarding what Google does and does not index;
13 Google would have that information.

14 **REQUEST FOR ADMISSION NO. 25**

15 Admit that GOOGLE’s search engine indexes websites automatically, as part
16 of its comprehensive indexing function.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

18 Objection: Vague and ambiguous. Perfect 10 does not know what this request
19 means. Furthermore, Perfect 10 lacks knowledge and information sufficient to enable
20 it to admit or deny this request; if it is comprehensible, it is something that Google
21 would have information on.

22 **REQUEST FOR ADMISSION NO. 36:**

23 Admit that GOOGLE does not use THUMBNAIL IMAGES for purposes of
24 artistic expression.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

26 Objection: This request is unclear. GOOGLE uses what it refers to as
27 THUMBNAIL IMAGES (which are really much larger than a person’s thumbnail)

1 for purposes of infringement. Perfect 10 lacks knowledge and information sufficient
2 to enable it to further admit or deny this request; if this request is understandable, it is
3 something that Google would have information on

4 **REQUEST FOR ADMISSION NO. 37:**

5 Admit that the primary use of GOOGLE's THUMBNAIL IMAGES is not for
6 artistic expression.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

8 Objection: This request is unclear. GOOGLE uses what it refers to as
9 THUMBNAIL IMAGES (which are really much larger than a person's thumbnail)
10 for purposes of infringement. There are REDUCED SIZE IMAGES that have artistic
11 expression. Perfect 10 lacks knowledge and information sufficient to enable it to
12 further admit or deny this request; if this request is understandable, it is something
13 that Google would have information on.

14 **REQUEST FOR ADMISSION NO. 53:**

15 Admit that GOOGLE does not have the legal right to stop third-party websites
16 from infringing PERFECT 10's copyrights.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

18 Objection: Calls for a legal conclusion.

19 **REQUEST FOR ADMISSION NO. 90:**

20 Admit that GOOGLE accommodates standard technical measures, as those
21 measures are defined in 17 U.S.C. § 512(i)(2)(A-C).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 90:**

23 Objection: Calls for a legal conclusion. Perfect 10 lacks knowledge and
24 information sufficient to enable it to admit or deny this request, since this is
25 information that Google has.

26 **REQUEST FOR ADMISSION NO. 91:**

27

1 Admit that GOOGLE does not interfere with standard technical measures, as
2 those measures are defined in 17 U.S.C. § 512(i)(2)(A-C).

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 91:**

4 Objection: Calls for a legal conclusion. Perfect 10 lacks knowledge and
5 information sufficient to enable it to admit or deny this request, since this is
6 information that Google has.

7 **REQUEST FOR ADMISSION NO. 103:**

8 Admit that GOOGLE is a provider of an interactive computer service.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 103:**

10 Objection: Vague and ambiguous; calls for a legal conclusion.

11 **REQUEST FOR ADMISSION NO. 136:**

12 Admit that GOOGLE does not create ADULT IMAGES.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 136:**

14 Objection: Vague and ambiguous; calls for a legal conclusion. GOOGLE
15 creates and develops adult content by creating reduced size adult images from larger
16 adult images, selecting which images to display to its users, and arranging them on
17 the screen which is displayed to the user. On that basis, Perfect 10 denies this request.

18 **REQUEST FOR ADMISSION NO. 139:**

19 Admit that GOOGLE is not in the business of creating ADULT IMAGES.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 139:**

21 Objection: Vague and ambiguous; calls for a legal conclusion. GOOGLE
22 creates and develops adult content by creating reduced size adult images from larger
23 adult images, selecting which images to display to its users, and arranging them on
24 the screen which is displayed to the user. On that basis, Perfect 10 denies this request.

25 **REQUEST FOR ADMISSION NO. 158:**

26 Admit that as of January 1, 2008, YOUR business relationship with FoneStarz
27 Media Limited had been cancelled.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 158:**

2 Admitted that Perfect 10 is not currently receiving any revenue from
3 FoneStarz. Perfect 10 has entered into discussions with FoneStarz about resuming its
4 relationship. On that basis, Perfect 10 denies the request. The problem, of course, is
5 that GOOGLE offers cell phone downloads of stolen Perfect 10 images for free,
6 destroying the market for authorized images that are paid for.

7 **B. GOOGLE’S POSITION :**

8 The above 16 Requests seek to determine (1) which of Perfect 10’s
9 assertedly infringed copyrighted works are compilations, (2) Perfect 10’s contentions
10 as to the fair use of the thumbnails displayed in Image Search results, and (3)
11 Google’s qualifications for the DMCA safe harbors. Again, these Requests were
12 intended to delineate the boundaries of Perfect 10’s many claims, and represent the
13 “very direct, informal and cheap way of narrowing the issues” that Judge Matz
14 encouraged the parties to employ. Herrick Decl., Exh. H. Instead of providing
15 substantive responses, Perfect 10 responded with baseless objections. These
16 Requests should be deemed admitted, or Perfect 10 should be ordered to properly
17 respond to them without further delay.

18 **1. Perfect 10 May Not Object on the Basis that Google’s**
19 **Requests Call for a Legal Conclusion.**

20 For Requests for Admission Nos. 2-5, 53, 90-91, 103, 136, 139 and 153
21 (as well as the 478 Requests listed in Section II to which Perfect 10 responded with
22 only boilerplate objections and colloquy), Perfect 10 objected that the Requests
23 “call[] for a legal conclusion” and failed to provide a substantive response. This is
24 improper.

25 Rule 36 itself provides, and the case law makes clear, that requests for
26 admission may properly require the application of law to fact so long as they do not
27 seek admissions on purely abstract questions of law. Fed. R. Civ. P. 36(a)(1)(A) (“A

1 party may serve on any other party a written request to admit . . . the truth of any
2 matters within the scope of Rule 26(b)(1) relating to: (A) facts, the application of law
3 to fact, or opinions about either . . .”; Marchand, 22 F.3d at 937 n.4 (finding that a
4 request for admission may require “an application of law to fact”); West Bay
5 Builders, Inc. v. United States, 80 Fed.Cl. 700, 703 (Fed. Cl. 2008) (“a request for
6 admission is not objectionable even if [it] require[s] opinions or conclusions of law,
7 as long as the legal conclusions relate to the facts of the case.”) (citation omitted);
8 Warnecke v. Scott, 79 Fed.Appx. 5, at *6 (5th Cir. 2003) (“requests for admissions
9 are properly used for facts or facts as applied to law”) (citing In re Carney, 258 F.3d
10 415, 418 (5th Cir. 2001); 8A Wright, Miller, & Cane, Federal Practice & Procedure, §
11 2255 & n. 8 (2003)); Treister v. PNC Bank, 2007 WL 521935, at *2 (S.D. Fla. 2007)
12 (rejecting such objections as “without merit”); Rutter, Civil Procedure Before Trial §
13 11:2006.

14 Each of these Requests seeks an admission regarding the application of
15 law to fact, and Google is entitled to a substantive response. That a request “calls for
16 a legal conclusion” is not a valid basis for objection. These Requests should be
17 ordered admitted, or Perfect 10 should be ordered to amend its responses to remove
18 the legal conclusion objection and fairly respond to the substance of the Requests.

19 **2. Perfect 10 May Not Object on the Basis that Google Has Or**
20 **May Have Information Regarding Its Own Requests for**
21 **Admission.**

22 Perfect 10 failed to provide a substantive response to Google’s Requests
23 for Admission Nos. 11, 17, 25, 36-37, and 91. It instead responded by stating that
24 “Google knows” how to respond to the Request, that the Request “is something that
25 Google would have information on,” or that “this is information that Google has.”
26 These are improper. The purpose of requests for admission is to “narrow issues for
27 trial,” and a party must provide all information at its disposal, even if the serving

1 party might have the information as well. Diederich, 132 F.R.D. at 617 (“Objections
2 that plaintiff should obtain the information by independent discovery and
3 investigation, or that the matter is already within plaintiff’s knowledge, are
4 [improper].”) Indeed, a key purpose of Requests for Admission is to determine the
5 *responding party's* view and thereby ascertain what issues are or are not in dispute.
6 Perfect 10's responses run directly contrary to the rules of discovery, which require
7 the disclosure of information *in the possession of the parties themselves*, their
8 attorneys, or any other agent that they control.

9 Moreover, Rule 36 provides that “[t]he answering party may assert lack
10 of knowledge or information as a reason for failing to admit or deny only if the party
11 states that it has made reasonable inquiry and that the information it knows or can
12 readily obtain is insufficient to enable it to admit or deny.” Fed. R. Civ. P. 36(a)(4)
13 (emphasis added). As detailed in Section II above, a court may order requests
14 admitted or order that amended responses be served when a party fails to make a
15 “reasonable inquiry” or fails to utilize “readily obtainable” information to admit or
16 deny a proper request for admission. See Asea, 669 F.2d 1247. Clearly Perfect 10
17 did not do so here, and instead tried to hoist the Request back onto Google so as to
18 avoid disclosing Perfect 10's own position in this litigation.

19 Perfect 10’s failure to respond to Google’s Requests for Admission
20 based upon its objections that Google has access to the information requested are
21 plainly improper. Google asks that these requests be ordered admitted, or that Perfect
22 10 be ordered to serve amended responses removing its improper objections and
23 fairly responding to the matters requested.

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1 **C. PERFECT 10’S POSITION :**

2 **Perfect 10 incorporates its preliminary statement (page 4, line 17 – page 7,**
3 **line 16) and the statement at page 343 line 12 – page 348, line 23 into this**
4 **Section.**

5 As a threshold matter, this Court should not order Perfect 10 to amend any
6 requests in the first set of requests for admissions. As set forth above, Google
7 prematurely served the Joint Stipulation before Perfect 10 had an opportunity to
8 amend responses in the first set. Google should not be rewarded for its over-
9 aggressive conduct. All of the requests complained about here are in the first set.

10 Google’s requests for admission are seeking a conclusion from Perfect 10 as to
11 whether certain copyrighted material would constitute a compilation under the
12 copyright laws. These are questions of law. “Requests for admissions cannot be used
13 to compel an admission of a conclusion of law. In addition, the Advisory Committee
14 Notes to the 1970 Amendment of Federal Rule of Civil Procedure 36 states that
15 although an admission of a matter involving the application of law to fact may narrow
16 the issues for trial, ‘requests for admission involving the application of law to fact
17 may create disputes between the parties which are best resolved in the presence of the
18 judge after much or all of the other discovery has been completed.’” (Playboy
19 Enterprises, Inc., v. Welles, 60 F. Supp. 2d 1050,1057 (S.D. Cal., 1999) (defendant
20 asked to admit that she was a public figure as defined in an unrelated case).)

21
22 **VI. CONCLUSIONS**

23 **A. GOOGLE’S CONCLUSION**

24 Perfect 10 has failed to properly respond to the bulk of Google’s
25 Requests for Admission. Google’s requests concern critical factual issues in the case,
26 attempting to define the boundaries of the dispute between the parties and determine
27 what contentions Perfect 10 intends to make at trial and in response to Google’s

1 upcoming motions for partial summary judgment. Indeed, the majority of Google's
2 requests concern the details of Perfect 10's own DMCA notices. Google's requests
3 present no undue burden, especially considering the size and complexity of the
4 lawsuit that Perfect 10 has brought. Perfect 10 has failed to abide by its obligations
5 under Rule 36, and Perfect 10's responses are incomplete, contain non-responsive
6 commentary, boilerplate language, inflammatory argument, and improper objections.
7 Accordingly, the Court should order Google's requests admitted or compel that
8 Perfect 10 fully and complete answer them consistent with Perfect 10's
9 responsibilities under Rule 36.

10 **B. PERFECT 10'S CONCLUSION**

11 For all of the reasons set forth above, Google's motion should be denied in its
12 entirety.

13
14
15 DATED: October 27, 2008

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17 By Rachel M. Herrick
18 Rachel M. Herrick
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20 DATED: October 27, 2008

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