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SAP AG, SAP AMERICA, INC., and
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ORACLE USA, INC., et al.,

Plaintiffs,

v.

SAP AG, et al.,

Defendants.

Case No. 07-CV-1658 PJH (EDL)

**DEFENDANTS' LIST OF OTHER
DISCOVERY RESPONSES FOR USE
AT NEW TRIAL**

1 Defendants submit the attached list of other discovery responses for use at trial. *See*
2 Exhibit "A." This list is limited to the claims and defenses currently available in this case based
3 on the parties' stipulations and the Court's prior orders, and may be updated in light of the
4 Defendants' ongoing efforts to streamline trial and the Court's further rulings on pending
5 motions.

6 Dated: April 26, 2012

Respectfully submitted,

Jones Day

8 By: /s/ Tharan Gregory Lanier
9 Tharan Gregory Lanier

10 Attorneys for Defendants
11 SAP AG, SAP AMERICA, INC., and
12 TOMORROWNOW, INC.
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Exhibit “A”

ORACLE USA, INC. ET AL. v SAP AG ET AL.
USDC -- NORTHERN DIST. OF CALIFORNIA
Case No. C 07 1658 PJH (EDL)

DEFENDANTS' DESIGNATIONS OF DISCOVERY RESPONSES FOR NEW TRIAL

Request	Response	No.
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	810
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	811
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	825
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	826
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	827
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	828
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	829
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	830
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	831
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	832
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	833
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	834

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DEFENDANTS' DESIGNATIONS OF DISCOVERY RESPONSES FOR NEW TRIAL

Request	Response	No.
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	835
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	836
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	837
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	838
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	839
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	840
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	841
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	842
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	914
Defendants' Fourth Set of Requests for Admission to Plaintiffs (Nos. 810-915) [Served 11/2/09]	Plaintiffs' Objections and Responses to Defendants' Fourth Set of Requests for Admission [Served 12/4/09]	915
TomorrowNow, Inc.'s First Set of Interrogatories to Plaintiffs (Nos. 1-15) [Served 7/26/07]	Plaintiffs' Fourth Amended and Supplemental Responses and Objections to Defendant TomorrowNow, Inc.'s First Set of Interrogatories [Served 11/11/09]	9

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DEFENDANTS' DESIGNATIONS OF DISCOVERY RESPONSES FOR NEW TRIAL

Request	Response	No.
TomorrowNow, Inc.'s First Set of Interrogatories to Plaintiffs (Nos. 1-15) [Served 7/26/07]	Plaintiffs' Fourth Amended and Supplemental Responses and Objections to Defendant TomorrowNow, Inc.'s First Set of Interrogatories [Served 11/11/09]	10
TomorrowNow, Inc.'s First Set of Interrogatories to Plaintiffs (Nos. 1-15) [Served 7/26/07]	Plaintiffs' Fourth Amended and Supplemental Responses and Objections to Defendant TomorrowNow, Inc.'s First Set of Interrogatories [Served 11/11/09]	11
TomorrowNow, Inc.'s Third Set of Interrogatories to Plaintiffs (Nos. 17-18) [Served 8/22/08]	Plaintiffs' Third Supplemental and Second Amended Responses and Objections to Defendant TomorrowNow, Inc.'s Third Set of Interrogatories [Served 12/4/09]	17
TomorrowNow, Inc.'s Fifth Set of Interrogatories to Plaintiffs (Nos. 22-98) [Served 2/13/09]	Plaintiffs' Supplemental Responses and Objections to Interrogatory Nos. 95-97 in Defendants' Fifth Set of Interrogatories (Siebel) [Served 9/18/09]	95
TomorrowNow, Inc.'s Fifth Set of Interrogatories to Plaintiffs (Nos. 22-98) [Served 2/13/09]	Plaintiffs' Supplemental Responses and Objections to Interrogatory Nos. 95-97 in Defendants' Fifth Set of Interrogatories (Siebel) [Served 9/18/09]	96
TomorrowNow, Inc.'s Fifth Set of Interrogatories to Plaintiffs (Nos. 22-98) [Served 2/13/09]	Plaintiffs' Supplemental Responses and Objections to Interrogatory Nos. 95-97 in Defendants' Fifth Set of Interrogatories (Siebel) [Served 9/18/09]	97
TomorrowNow, Inc.'s Fifth Set of Interrogatories to Plaintiffs (Nos. 22-98) [Served 2/13/09]	Plaintiffs' Supplemental Responses and Objections to Interrogatory No. 98 in Defendants' Fifth Set of Interrogatories (Siebel) [Served 9/18/09]	98