

EXHIBIT Q

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19 TOMORROWNOW, INC.

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 ORACLE CORPORATION, et al.,
24 Plaintiffs,
25 v.
26 SAP AG, et al.
27 Defendants.

Case No. 07-CV-1658 PJH

**DEFENDANT TOMORROWNOW,
INC.'S FIRST AMENDED RESPONSES
TO PLAINTIFF ORACLE CORP.'S
THIRD SET OF INTERROGATORIES
AND SAP AMERICA, INC.'S, AND SAP
AG'S FIRST AMENDED RESPONSES
TO PLAINTIFF ORACLE CORP.'S
SECOND SET OF
INTERROGATORIES**

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AMENDED RESPONSE TO INTERROGATORY NO. 4:

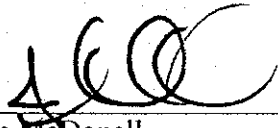
Defendants amend subparagraph 2 of their response to this Interrogatory as follows:

2. By March 2005, the SAP AG executive board issued a directive to TomorrowNow's management to remove customer local environments from TomorrowNow computers. CEO Andrew Nelson was instructed to evaluate and implement removal of customer Local Environments from TomorrowNow computers. In response to this direction, TomorrowNow initiated a project to investigate removal of customer Local Environments from TomorrowNow computers. Some have referred to this project as "Project Blue." On certain occasions, Andrew Nelson would communicate the status of the project to Thomas Ziemen. The following current and former TomorrowNow employees were involved in the evaluation and execution of the project: Julio Guzman, Catherine Hyde, Beth Lester, George Lester, Andrew Nelson, Greg Nelson, Shelley Nelson, Owen O'Neil, Josh Testone, and Eskander Yavar.

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Dated: October 7, 2008.

JONES DAY

By: 

Jason McDonnell

Counsel for Defendants
SAP AG, SAP AMERICA, INC., and
TOMORROWNOW, INC.

1 **PROOF OF SERVICE**

2 I, Grace A. Wayte, declare:

3 I am a citizen of the United States and employed in Santa Clara County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business address
5 is 555 California Street, 26th Floor, San Francisco, California 94104. On October 7, 2008, I
6 served a copy of the attached document(s):

7 **DEFENDANT TOMORROWNOW, INC.'S RESPONSES TO PLAINTIFF
8 ORACLE CORP.'S THIRD SET OF INTERROGATORIES AND SAP
9 AMERICA, INC.'S, AND SAP AG'S RESPONSES TO PLAINTIFF
ORACLE CORPORATION'S SECOND SET OF INTERROGATORIES**

- 10 by transmitting via facsimile the document(s) listed above to the fax number(s) set
11 forth below on this date before 5:00 p.m.
- 12 by placing the document(s) listed above in a sealed envelope with postage thereon
13 fully prepaid, in the United States mail at San Francisco, California addressed as
set forth below.
- 14 by transmitting via e-mail or electronic transmission the document(s) listed above
15 to the person(s) at the e-mail address(es) set forth below.

16 Christopher B. Hockett, Esq.
17 Geoffrey M. Howard, Esq.
18 Zachary J. Alinder, Esq.
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23 Executed on October 7, 2008, at San Francisco, California.

24 By: Grace A. Wayte
25 Grace A. Wayte
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