

# EXHIBIT 2

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17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20  
21 ORACLE CORPORATION, a Delaware  
corporation, ORACLE USA, INC., a Colorado  
22 corporation, and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

23 Plaintiffs,

24 v.

25 SAP AG, a German corporation, SAP  
AMERICA, INC., a Delaware corporation,  
26 TOMORROWNOW, INC., a Texas corporation,  
and DOES 1-50, inclusive,

27 Defendants.  
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CASE NO. 07-cv-01658 (MJJ)

**PLAINTIFFS' FIRST SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO DEFENDANT  
TOMORROWNOW, INC.**

07-CV-1658 MJJ

1 allegations in Oracle's Complaint and First Amended Complaint, including without limitation all  
2 Documents relating to the "immediate and thorough examination of all questions raised by the  
3 Oracle allegations," as described by SAP AG CEO Henning Kagermann on July 3, 2007 at an  
4 SAP AG press conference call.

5 **REQUEST FOR PRODUCTION NO. 81:**

6 All Documents relating to the decision to appoint Mark White as Your Executive  
7 Chairman and the decision to "institute changes in TomorrowNow's operational management to  
8 ensure compliance with appropriate business practices," as described by SAP AG CEO Henning  
9 Kagermann on July 3, 2007 at an SAP AG press conference call.

10 **REQUEST FOR PRODUCTION NO. 82:**

11 All Documents relating to Mark White's decisions, analysis, and actions as Your  
12 Executive Chairman, including without limitation all Documents relating to any "enforce[ment  
13 of] existing procedures," any "implement[ation] of new policies," and any "renewed training for  
14 TomorrowNow employees," as described by SAP AG CEO Henning Kagermann on July 3, 2007  
15 at an SAP AG press conference call.

16 **REQUEST FOR PRODUCTION NO. 83:**

17 All Documents relating to Your Customers' reaction to this lawsuit and to Your Answer  
18 to the First Amended Complaint, including without limitation all Documents relating to SAP AG  
19 CEO's statement on July 3, 2007 at an SAP AG press conference call that "we will continue to  
20 give the support to TomorrowNow's customers and so they should not be concerned about this  
21 [lawsuit]."

22 **REQUEST FOR PRODUCTION NO. 84:**

23 All Documents relating to Department of Justice, Federal Bureau of Investigation, or  
24 other federal, state, or local government agency's request or investigation into the allegations in  
25 the Complaint and First Amended Complaint, including without limitation all Documents  
26 provided by You to any such agency in response to a request or investigation of those  
27 allegations.

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