

EXHIBIT C

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15 EMEA Ltd., and Siebel Systems, Inc.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 ORACLE USA, INC., *et al.*,

20 Plaintiffs,

21 v.

22 SAP AG, *et al.*,

23 Defendants.

CASE NO. 07-CV-01658 PJH (EDL)

**PLAINTIFFS' SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO
DEFENDANTS' FIFTH SET OF
INTERROGATORIES (DATABASE)**

**CONTAINS HIGHLY
CONFIDENTIAL INFORMATION
DESIGNATED PURSUANT TO
PROTECTIVE ORDER**

1 Limited and OEMEA

2 **INTERROGATORY NO. 34:**

3 State whether OEMEA is currently, or has been in the past, registered to do business in
4 the state of California and, if so, the time periods during which the registrations were effective.

5 **RESPONSE TO INTERROGATORY NO. 34:**

6 In addition to its General Objections, Oracle further objects to this Interrogatory to the
7 extent it seeks disclosure of information protected from discovery by any privilege, protection or
8 immunity, including but not limited to attorney-client privilege and work product protection.

9 Oracle further objects to this Interrogatory to the extent that it purports to require Oracle to do
10 anything beyond the reasonable search for responsive information required by the Federal Rules
11 of Civil Procedure, in particular with respect to historical information related to PeopleSoft, J.D.
12 Edwards and/or Siebel.

13 Subject to and without waiver of the foregoing General and Specific objections,
14 Oracle responds that it is currently unaware that Oracle EMEA Limited has ever been registered
15 to do business in the State of California.

16 **INTERROGATORY NO. 35:**

17 For each PeopleSoft and J.D. Edwards entity to which OEMEA claims to be a successor
18 in interest, state whether the entity was registered to do business in the state of California at any
19 time between 2002 and the date on which OEMEA succeeded it in interest, and, if so, the times
20 periods during which each registration was effective.

21 **RESPONSE TO INTERROGATORY NO. 35:**

22 In addition to its General Objections, which Oracle incorporates here by reference,
23 Oracle objects to the use of the undefined terms “successor in interest,” “entity,” “registered,”
24 and “business” on the grounds that they are vague and ambiguous. Oracle further objects to this
25 Interrogatory to the extent it seeks disclosure of information protected from discovery by any
26 privilege, protection or immunity, including but not limited to attorney-client privilege and work
27 product protection. Oracle objects to this Interrogatory to the extent it seeks expert testimony or
28 a legal conclusion. Oracle further objects to this Interrogatory to the extent it calls for

1 revenues regarding the same. Oracle further responds that the amount of damage to Oracle from
2 this illegal conduct is properly subject to expert opinion, which shall be provided at the
3 appropriate time.

4 DATED: November 11, 2009

5 BINGHAM McCUTCHEN LLP

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7 By: _____


8 Zachary J. Alinder
9 Attorneys for Plaintiffs
10 Oracle USA, Inc., Oracle international Corp.,
11 Oracle EMEA Ltd., and Siebel Systems, Inc.

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