

EXHIBIT A

PLAINTIFFS' DRAFT PROPOSED INITIAL AND JURISDICTIONAL DISCOVERY PLAN

Plaintiffs propose the following limited discovery plan to meet the initial and jurisdictional discovery needs presented by the defendants' series of motions to dismiss and associated motions. Discovery will be focused on the specific issues and factual matters raised and put into question by the defendants in their Motions. It will consist of no more than five depositions, five interrogatories, and ten document production requests, and will seek to be concluded within thirty days of initiation.

DEPOSITIONS

Plaintiffs request depositions from officials, and possibly from former officials, of Yahoo! Inc and its affiliates doing business in China who have first-hand knowledge or information, or custody of such information, related to the following matters associated with the issues, facts, or arguments addressed in the Defendants' August 27, 2007 motions:

1. Officials involved with receipt and or responses to requests from Chinese officials to Yahoo, and responses and other communications related to these requests, associated with providing identifying information of internet users in China.
2. Officials involved with whether and how to respond to such requests.
3. Officials dealing with or having custody of notes testimony to Congress regarding the decision to deliver the requested internet user information.
4. Policies and standards applied to dealing with and responding to such requests.
5. Officials dealing with or having custody of licensing agreements, contracts and other material associated with the organizational and structural arrangements and responsibilities; methods of operations, ways of conducting business, financial arrangements and other business activities involving Yahoo.
6. Past organizational structures, agreements, contracts, etc. associated with Yahoo! Inc. and Yahoo!'s Chinese affiliates during the periods of time when the abuses in question took place. (2001-2004)
7. Communications between and among Yahoo! Inc., Yahoo!'s Chinese affiliates, and officials of the Government of China relative to requests for internet user information, the arrest and detention of Yahoo!'s internet users, and the Government of China's views on this litigation.

INTERROGATORIES

Interrogatories will cover the following issues, factual matters and/or areas of inquiry related to the Defendants' motions to dismiss and associated motions:

1. Identification of the appropriate corporate officials at Yahoo! Inc. and its Chinese affiliates who are responsible for or associated with the corporate organization and structural issues, the delivery of internet user identification issues, and the communication with Chinese officials referenced in the proceeding section on Depositions.
2. Issues associated with corporate structures, organizational responsibilities and related contracts, agreements, methods and division of responsibilities and

- operations between and among Yahoo! Inc. and its Chinese affiliates, at the present time and under each prior structural arrangement in the past.
3. Issues associated with requests made to Yahoo! by Chinese officials related to obtaining internet user identification information, and the responses made by Yahoo! to these requests.
 4. Issues associated with communications between Chinese officials and Yahoo! officials on matters associated with the status, detention, and treatment of those arrested and detained for internet use as a result of Yahoo!'s disclosures of internet user identifying information.

DOCUMENT PRODUCTION

A limited number of documents will be requested focusing on the following issues:

1. Licensing agreements and other contracts between Yahoo! Inc. and its Chinese affiliates.
2. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external, related to Yahoo! Inc.'s and its Chinese affiliates efforts to enter, develop business contacts and maintain its operations in China, its reasons to establish organizational structures for these purposes, and changes made to these structures.
3. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external, related to corporate structures, methods of operations, common departments, including all divisions of responsibility between and among Yahoo! Inc. and its China affiliates for all periods of time beginning with the 2001-2004 period.
4. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external related to the government of China's request from official or response to such request by Yahoo! and Yahoo! affiliates on internet use in China.
5. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external, related to the split in ownership of stock between Yahoo! Inc and its China affiliates for all periods of time beginning with the 2001-2004 period
6. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external, related to the existence (if any) of a separate holding company that owned stock in Yahoo! Inc., and its China affiliates for all periods of time including but not limited to the 2001-2004 period
7. Copies of all documents, e-mail communications, notes or written materials in any form whether internal or external, relating to the existence (if any) of a financing company that provided finance to Yahoo! Hong Kong and other China affiliates for all periods of time beginning with the 2001-2004 period, and the relationship between this financing company and Yahoo! Inc.