

EXHIBIT I

1 [SEE SIGNATURE BLOCK FOR COUNSEL]

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

10 **GOOGLE INC., AOL LLC, YAHOO!**
11 **INC., IAC SEARCH & MEDIA, INC., and**
12 **LYCOS, INC.**

12 **Plaintiffs**

13 **v.**

14 **L. DANIEL EGGER, SOFTWARE**
15 **RIGHTS ARCHIVE, LLC, and SITE**
16 **TECHNOLOGIES, INC.**

16 **Defendants**

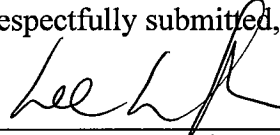
Case No. CV08-03172RMW

SOFTWARE RIGHTS ARCHIVE, LLC'S
OBJECTIONS AND RESPONSES TO
PLAINTIFFS' SECOND SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND THINGS

18 **To:** Google Inc. and AOL LLC, by and through their attorneys of record Juanita R. Brooks,
19 Fish & Richardson P.C., 12390 El Camino Real, San Diego, California 92130; Thomas
20 B. Walsh, IV, Fish & Richardson P.C., 1717 Main Street, Suite 5000, Dallas, Texas
21 75201; Ramon K. Tabtiang, Stephen A. Marshall, Fish & Richardson P.C. 225 Franklin
22 Street, Boston, Massachusetts 02110-2804; Harry L. Gillam, Jr., Melissa R. Smith,
23 Gillam & Smith, L.L.P., 303 South Washington Ave., Marshall, Texas 75670 and IAC
24 Search & Media, Inc. and Lycos, Inc, by and through their attorneys of record Jennifer A.
25 Kash, Quinn Emanuel Urquhart Oliver & Hedges, LLP 50 California St., 22nd Floor, San
26 Francisco, CA 94111 and Claude M. Stern, Quinn Emanuel Urquhart Oliver & Hedges
27 LLP, 555 Twin Dolphin Dr., Suite 560, Redwood Shores, CA 94065.

28 Software Rights Archive, LLC ("SRA," to be distinguished from SRA's parent "SRA,
LLC") makes the following objections and responses to Plaintiffs' Second Set of Requests for
Production of Documents and Things to Software Rights Archive, LLC.

1 Respectfully submitted,

2 

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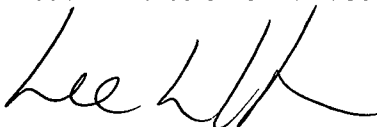
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23 Email: jellwanger@dpelaw.com

24 Attorneys for Defendants L. Daniel Egger, Software
25 Rights Archive, LLC, and Site Technologies, Inc.

26 **CERTIFICATE OF SERVICE**

27 I hereby certify that a true and correct copy of the above and foregoing instrument has
28 been forwarded to all counsel of record pursuant to Federal Rules of Civil Procedure on this the
15th day of January, 2008.

15 
16 _____
17 Lee L. Kaplan

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GENERAL OBJECTIONS

1. SRA objects to these requests to the extent that they request documents unrelated to whether Egger or SRA possessed sufficient contacts with California to give rise to personal jurisdiction in this Court (“personal jurisdiction”). *See* Fed. R. Civ. P. 26(b)(1) (limiting discovery to relevant matters).
2. SRA objects to these requests to the extent that they request documents protected by the attorney-client and/or attorney work product privileges.

1 **OBJECTIONS AND RESPONSES TO SECOND REQUESTS FOR**
2 **PRODUCTION OF DOCUMENTS AND THINGS**

3 **REQUEST FOR PRODUCTION NO. 15:**

4 All DOCUMENTS RELATING TO the corporate structure, organization, and
5 management of YOU (including specifically Software Rights Archive, Inc.), including without
6 limitation YOUR (including specifically Software Rights Archive, Inc.) corporate records,
7 articles of incorporation, and bylaws.

8 **RESPONSE:**

9 SRA objects to this request to the extent that it seeks documents protected by the
10 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
11 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
12 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
13 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
14 documents responsive to this request.

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

16 DOCUMENTS sufficient to IDENTIFY all the corporate assets of YOU (including
17 specifically Software Rights Archive, Inc.).

18 **RESPONSE:**

19 SRA objects to this request to the extent that it seeks documents protected by the
20 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
21 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
22 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
23 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
24 documents responsive to this request.

25 **REQUEST FOR PRODUCTION NO. 17:**

26 DOCUMENTS sufficient to IDENTIFY all capital, equity, loans, line of credit, or
27 investment established in or for YOU (including specifically Software Rights Archive, Inc.),

1 including all capital, equity, loans, lines of credit, or investments made in YOU (including
2 specifically Software Rights Archive, Inc.) by L. Daniel Egger.

3 **RESPONSE:**

4 SRA objects to this request to the extent that it seeks documents protected by the
5 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
6 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
7 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
8 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
9 documents responsive to this request.

10 **REQUEST FOR PRODUCTION NO. 18:**

11 DOCUMENTS sufficient to IDENTIFY all YOUR (including specifically Software
12 Rights Archive, Inc.) past or present employees, partners, agents, officers, owners, and/or
13 directors, including organizational charts, personnel files, start date and end date, and
14 responsibilities.

15 **RESPONSE:**

16 SRA objects to this request to the extent that it seeks documents protected by the
17 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
18 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
19 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
20 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
21 documents responsive to this request.

22 **REQUEST FOR PRODUCTION NO. 19:**

23 DOCUMENTS sufficient to DESCRIBE YOUR (including specifically Software Rights
24 Archive, Inc.) relationship with L. Daniel Egger, including his role, title, interest in YOU, and
25 compensation at all times (including at all times since January 7, 2004).

26 **RESPONSE:**

27 SRA objects to this request to the extent that it seeks documents protected by the

1 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
2 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
3 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
4 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
5 documents responsive to this request.

6 **REQUEST FOR PRODUCTION NO. 20**

7 DOCUMENTS sufficient to IDENTIFY each physical location (i.e., office or other
8 business location) for YOU (including specifically Software Rights Archive, Inc.) and each
9 lease, deed, or other agreement granting YOU use of each such physical location.

10 **RESPONSE:**

11 SRA objects to this request to the extent that it seeks documents protected by the
12 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
13 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
14 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
15 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
16 documents responsive to this request.

17 **REQUEST FOR PRODUCTION NO. 21:**

18 DOCUMENTS sufficient to IDENTIFY all estimated and actual revenues, expenses,
19 costs, profits, margins, and sales earned or incurred by YOU (including specifically Software
20 Rights Archive, Inc.) from January 1, 2004, to the present.

21 **RESPONSE:**

22 SRA objects to this request to the extent that it seeks documents protected by the
23 attorney-client and/or attorney work product privileges. SRA objects to this request because the
24 documents it seeks are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
25 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
26 documents responsive to this request.

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

1 All DOCUMENTS sufficient to identity each PERSON having any management
2 authority or control over YOU, including such PERSON'S role, title, and interest in YOU
3 (including at all times since January 7, 2004).

4 **RESPONSE:**

5 SRA objects to this request to the extent that it seeks documents protected by the
6 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
7 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
8 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
9 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
10 documents responsive to this request.

11 **REQUEST FOR PRODUCTION NO. 23:**

12 All of YOUR corporate filings with any federal, state, or local government or
13 government agency.

14 **RESPONSE:**

15 SRA objects to this request to the extent that it requests documents unrelated to SRA's
16 contacts with California, because such documents are irrelevant to personal jurisdiction. *See*
17 Fed. R. Civ. P. 26(b)(1) (limiting discovery to relevant matters). Subject to and without waiving
18 these objections, SRA has no documents responsive to this request.

19 **REQUEST FOR PRODUCTION NO. 24:**

20 All minutes from every one of YOUR board of directors' meeting.

21 **RESPONSE:**

22 SRA objects to this request to the extent that it seeks documents protected by the
23 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
24 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
25 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
26 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
27 documents responsive to this request.

1 **REQUEST FOR PRODUCTION NO. 25:**

2 ALL DOCUMENTS RELATING TO YOUR formation and the circumstances
3 surrounding it, including without limitation the role of Daniel Egger in such FORMATION.

4 **RESPONSE:**

5 SRA objects to this request to the extent that it seeks documents protected by the
6 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
7 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
8 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
9 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
10 documents responsive to this request.

11 **REQUEST FOR PRODUCTION NO. 26:**

12 ALL DOCUMENTS RELATING TO each change in YOUR status or YOUR name,
13 including without limitation all documents describing the name change from Software Rights
14 Archive, LLC to Software Rights Archive, Inc., the associated circumstances, and the identity of
15 each PERSON involved.

16 **RESPONSE:**

17 SRA objects to this request to the extent that it seeks documents protected by the
18 attorney-client and/or attorney work product privileges. SRA objects to this request to the extent
19 that it requests documents unrelated to SRA's or Egger's contacts with California, because such
20 documents are irrelevant to personal jurisdiction. *See* Fed. R. Civ. P. 26(b)(1) (limiting
21 discovery to relevant matters). Subject to and without waiving these objections, SRA has no
22 documents responsive to this request.