

EXHIBIT 17

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XEROX CORPORATION,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	C.A. No. 10-136-JJF-MPT
)	
GOOGLE INC., YAHOO! INC., RIGHT)	REDACTED -
MEDIA INC., RIGHT MEDIA LLC,)	PUBLIC VERSION
YOUTUBE, INC., and YOUTUBE, LLC,)	
)	
<i>Defendants.</i>)	

XEROX’S INITIAL DISCLOSURES

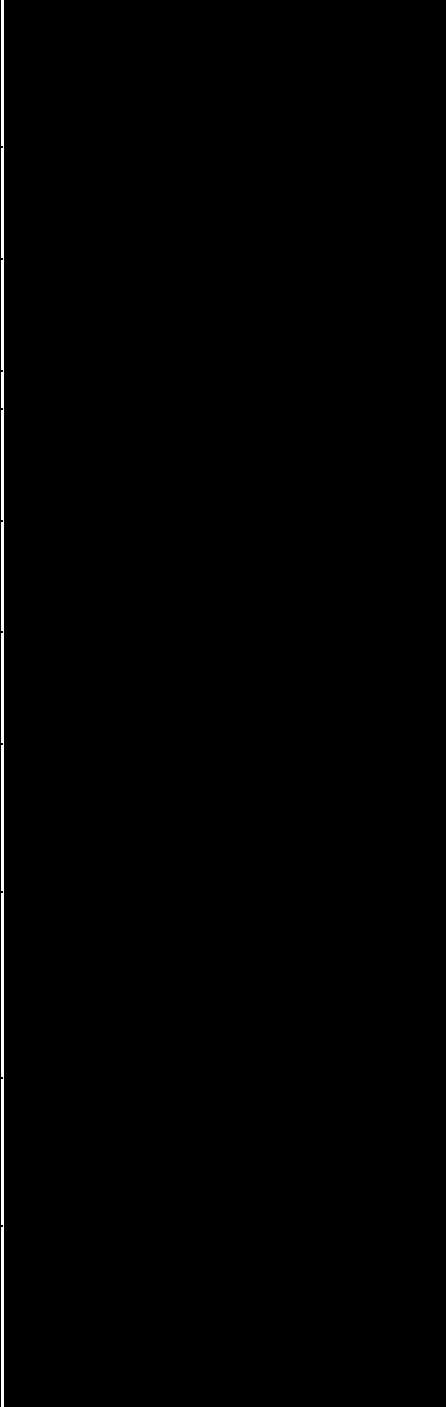
Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Xerox Corporation (“Xerox”), by and through its attorneys, hereby makes the following initial disclosures to Defendants Google Inc. (“Google”), Yahoo! Inc. (“Yahoo”), Right Media Inc. and Right Media LLC (collectively, “Right Media”), and YouTube, Inc. and YouTube, LLC (collectively, “YouTube”). Xerox makes these Disclosures based on information reasonably available to it as of the date hereof and reserves the right to amend and supplement these Disclosures. Xerox makes these Disclosures subject to, and without waiver of, any attorney-client or work product privilege or any other applicable privilege or immunities.

A. Individuals Possessing Information

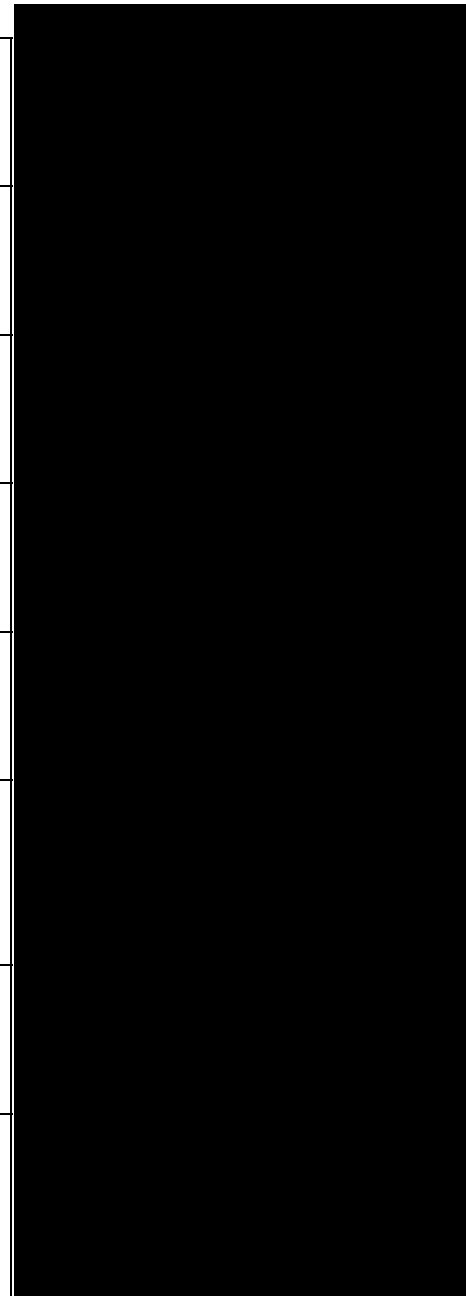
“[T]he name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;”

Based on Xerox’s investigation to date, the following individuals are likely to have discoverable information that Xerox may use in support of its claims or defenses. Each

subject of information identified represents only those broad areas of relevant information each individual is believed to possess, and may not be exhaustive in its scope.

Name	Area of Knowledge	Last Known Address and Telephone Number
Gregory T. Grefenstette	U.S. Patent 6,778,979	
James G. Shanahan	U.S. Patent 6,778,979	
Ronald M. Swartz	U.S. Patent 6,236,994	
Jeffrey L. Winkler	U.S. Patent 6,236,994	
Igor W. Markidan	U.S. Patent 6,236,994	
Qun Dou	U.S. Patent 6,236,994	
Evelyn A. Janos	U.S. Patent 6,236,994	
Mathieu Chuat	Licensing negotiations related to the patents-in-suit.	
Paul Schnose	Licensing negotiations related to the patents-in-suit.	
Thomas Zell	Licensing negotiations related to the patents-in-suit and prosecution of the patents-in-suit.	
Duane Basch (formerly at Xerox Corporation)	Prosecution of the patents-in-suit.	

William F. Eipert	Prosecution of the patents-in-suit.
Kapu Kumar	Licensing negotiations related to the patents-in-suit.
Paul Riley	Licensing negotiations related to the patents-in-suit.
Aikaterini Varsou	Licensing negotiations related to the patents-in-suit.
Steve Shin	Licensing negotiations related to the patents-in-suit.
Andres Diaz	Licensing negotiations related to the patents-in-suit.
Sanjay Prasad (formerly at IPValue Management Inc.)	Licensing negotiations related to the patents-in-suit.
Google, Yahoo, Right Media and YouTube personnel.	The accused Google, Yahoo, Right Media and YouTube products and services and licensing negotiations related to the patents-in-suit.



The individuals specifically listed above should be contacted only through Xerox counsel. Xerox's investigation is ongoing, and Xerox reserves the right to identify additional witnesses who are likely to have discoverable information that Xerox may use to support its claims or defenses.

B. Documents, Data Compilations and Tangible Things

“A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment”

Xerox identifies the following categories of documents, data compilations and tangible things in the possession, custody or control of Xerox that, at present, may be used in support of Xerox’s claims or defenses:

1. U.S. Patent Nos. 6,778,979 and 6,236,994 (the “patents-in-suit”) and the prosecution histories of the patents-in-suit;
2. Documents concerning the development of the inventions embodied in the patents-in-suit.
3. Documents concerning Xerox’s licensing of the patents-in-suit.

Xerox reserves the right to object to the production of any document, data compilation and tangible thing within the categories described above on any basis permitted by the Federal Rules of Civil Procedure, by the local rules or orders of this Court or by any agreements or stipulations between the parties. The above documents are believed to be located at Xerox facilities in Rochester, NY; Webster, NY; and Grenoble, France. Xerox’s investigation is ongoing, and Xerox reserves the right to identify additional documents, data compilations and other tangible things that Xerox may use to support its claims or defenses.

C. Computation of Damages

“A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered”

Xerox is seeking injunctive relief and damages for infringement of the patents-in-suit, including increased damages for willful infringement up to three times the actual damages. Under the law, Xerox is entitled to at least a reasonable royalty for use of the patented inventions. *See* 35 U.S.C. § 184. Damages based on a reasonable royalty rate will be measured and calculated according to the tests and factors set forth in relevant case law. To analyze these factors, Xerox will need discovery from Google, Yahoo, Right Media and YouTube, and, potentially, discovery from third parties. Xerox will also likely rely on expert analysis and opinion concerning damages. As a result, Xerox is unable to provide a precise computation of its damages at this time.

D. Insurance Agreements

“For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment”

Not applicable.

Dated: May 25, 2010

ASHBY & GEDDES,

/s/ John G. Day

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2010, the attached **XEROX'S INITIAL DISCLOSURES** was served upon the below-named counsel of record at the address and in the manner indicated:

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