

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XEROX CORPORATION,)	
)	
<i>Plaintiff-Counterclaim Defendant,</i>)	
)	
v.)	C.A. No. 10-136-JJF-MPT
)	
GOOGLE INC., YAHOO! INC., RIGHT)	JURY TRIAL DEMANDED
MEDIA INC., RIGHT MEDIA LLC,)	
YOUTUBE, INC., and YOUTUBE, LLC,)	
)	
<i>Defendants-Counterclaim Plaintiffs.</i>)	

**XEROX’S RESPONSES AND OBJECTIONS TO GOOGLE INC.’S AND YOUTUBE
LLC’S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the local rules of this Court, plaintiff-counterclaim defendant Xerox Corporation (“Xerox”) hereby responds and objects to the interrogatories set forth in Google Inc. and YouTube LLC’s First Set of Interrogatories to Plaintiff Xerox Corporation (“the Interrogatories”), dated April 23, 2010.

GENERAL OBJECTIONS

1. Xerox objects to the Interrogatories on the grounds that they comprise multiple interrogatories, definitions, instructions and subparts requiring discrete answers.
2. Xerox objects to the Interrogatories, including but not limited to instructions and definitions contained therein, to the extent that they purport to impose obligations beyond those imposed by Federal Rules of Civil Procedure, the local rules of this court or other applicable law. Xerox’s responses and objections herein and Xerox’s identification and disclosure of any information and documents in response to the Interrogatories shall not waive or prejudice any objections Xerox may later assert, including, but not limited to,

15. Given the early stage of this litigation, Xerox's development of the facts is continuing and its answers to these Interrogatories are necessarily preliminary. Xerox reserves the right to supplement or revise its responses to the Interrogatories.

16. Xerox's General Objections are incorporated into each of the responses to the specific Interrogatories that follow.

17. Subject to and without waiver of the foregoing General Objections, as modified and agreed to by the parties, Xerox answers the Interrogatories as follows:

RESPONSES

Interrogatory No. 1

Identify each claim of the PATENTS-IN-SUIT that YOU assert is being INFRINGED by Google and/or YouTube.

Response to Interrogatory No. 1

At present, Xerox is asserting at least independent claims 1 and 18 of the '979 Patent against Google. In addition, at present, Xerox is asserting at least independent claim 9 of the '994 Patent against Google and YouTube. Xerox reserves its right to supplement, revise or render more specific its response to Interrogatory No. 1.

Interrogatory No. 2

Identify, with respect to each ASSERTED CLAIM of the PATENTS-IN-SUIT, everyone of Google and YouTube's products that you allege infringes each such claim, by explaining fully and completely how each such product allegedly infringes each such claim, including, without limitation, an explanation of whether such alleged infringement is literal or by equivalents; an explanation of how 35 U.S.C. § 112 is satisfied if applicable (including without limitation identification of corresponding structures in the patent specification and the ACCUSED PRODUCTS and an explanation of how they are the same or equivalent); an explanation of whether such alleged infringement is direct (i.e., under 35 U.S.C. § 271(a)) or indirect (i.e., under 35 U.S.C. §§ 271 (b) and (c)); and if indirect, an identification of each third party whose alleged infringement is direct. Provide claim charts as part of YOUR answer.

Response to Interrogatory No. 2

As presently advised, Xerox identifies the following Google and YouTube products that infringe the patents in suit. Xerox is not at this time asserting indirect infringement or infringement by equivalents. However, Xerox reserves its right to supplement, revise or render more specific its response to Interrogatory No. 2, including without limitation to make such assertions.

'979 Patent Limitation Claim 1	'979 Patent Limitation Claim 18	Direct Infringement - Google AdSense/AdWords
A method for automatically generating a query from selected document content, comprising:	An article of manufacture for use in a computer system, comprising:	
--	a memory	Google AdSense/AdWords runs on computers that include memory, such as RAM, hard drives or other forms of storage.
--	instructions stored in the memory for operating a method for automatically generating a query from selected document content, comprising:	The memory stores instructions for automatically generating a query from selected document content, as outlined more fully below.
defining an organized classification of document content with each class in the organized classification of document content having associated therewith a classification label; each classification label corresponding to a category of information in an information retrieval system;	Same.	Google AdSense/AdWords defines and utilizes an organized classification of document content (e.g., webpage content) with classification identifiers corresponding to categories in the AdSense/AdWords information retrieval system.
automatically identifying a set of entities in the selected document content for searching additional information related thereto using the information retrieval system;	Same.	Google AdSense/AdWords employs algorithms to analyze webpages and to identify information (including, without limitation, non-compositional compounds) in the webpage content for searching additional information (e.g., advertisements) using the AdSense/AdWords

		information retrieval system.
automatically categorizing the selected document content using the organized classification of document content for assigning the selected document content a classification label from the organized classification of content; and	Same.	Google AdSense/AdWords automatically categorizes webpages using an organized classification of document content and assigns each webpage a classification or classifications corresponding to a category or categories in the AdSense/AdWords information retrieval system.
automatically formulating the query to restrict a search at the information retrieval system for information concerning the set of entities to the category of information in the information retrieval system identified by the assigned classification label.	Same.	Google AdSense/AdWords automatically formulates queries at the AdSense/AdWords information retrieval system for information (<i>e.g.</i> , advertisements) concerning entities identified in a webpage. Such queries are restricted to the category or categories of information corresponding to the classification or classifications of the webpage.

'994 Patent Limitation Claim 9	Direct Infringement - Google Maps, Google Video and YouTube.com
A method for providing application interoperability and synchronization between heterogeneous document and data sources comprising steps of	
storing data in a first database memory;	Google Maps stores data (<i>e.g.</i> , user comments, reviews and/or ratings relating to businesses, restaurants, points of interest, etc.) in a database memory. Google Video and YouTube.com store data (<i>e.g.</i> , user comments, reviews and/or ratings relating to hosted videos) in a database memory.
performing data analysis operations using the data stored in the first database to generate data and analysis results;	Google Maps, Google Video and YouTube.com perform data analysis operations on the data (<i>e.g.</i> , user comments, reviews and/or ratings) to generate data and analysis results in the form of, for example, aggregate ratings, average ratings, numbers of comments and/or numbers of ratings or reviews.
independently storing knowledge, in the	Google Maps independently stores information (<i>e.g.</i> ,

<p>form of documents, in a document database, including validating the accuracy of the knowledge and making the stored knowledge available across a network;</p>	<p>information relating to geographic locations, businesses, restaurants, points of interest and other elements) in the form of documents in a document database, and validates that this information is accurate. This information is made available across the internet.</p> <p>Google Video and YouTube.com independently store information (e.g., information relating to videos) in the form of documents in document/video databases and validate that this information is accurate. This information is made available across the internet.</p>
<p>managing the flow of information between the first database and the document database to enable the integration of the data and analysis results with the documents and to automatically update the documents upon the occurrence of a change in the data or analysis results.</p>	<p>Google Maps, Google Video and YouTube.com manage the flow of information between the first databases and the document databases to enable the integration of data and analysis results (e.g., aggregate user ratings, average user ratings, numbers of comments, numbers of ratings or reviews) with the documents identified above so that those documents are updated to reflect the most recent user reviews, comments and/or ratings when such reviews, comments and/or ratings change.</p>

Interrogatory No. 3

Identify all bases for PLAINTIFF’s allegation that Google and YouTube’s alleged INFRINGEMENT has been willful, malicious and otherwise without justification or excuse, including without limitation, stating the date and manner in which Google and YouTube were first notified or became aware that it was allegedly INFRINGING the PATENTS-IN-SUIT, the allegedly INFRINGING activity, and all facts upon which you base YOUR contention that Google and YouTube knew that such activity was INFRINGING the PATENTS-IN-SUIT and that such INFRINGEMENT was willful.

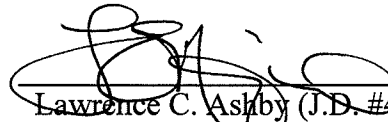
Response to Interrogatory No. 3

Google and YouTube have withdrawn this interrogatory.

Interrogatory No. 4

IDENTIFY any and all inspection, testing, evaluation, or analysis of any of Google and YouTube’s products or services that you allege INFRINGES any claim of the PATENTS-IN-SUIT, and state: the particular products inspected, tested, evaluated, or analyzed; the nature of the inspection, testing, evaluation, or analysis performed; any and all PERSONS involved in the inspection, testing, evaluation, or analysis; the dates of the inspection, testing, evaluation, or analysis; the results of such inspection, testing, evaluation, or analysis, identifying the DOCUMENTS (by Bates number) reflecting those results; and any conclusion(s) or opinion(s) formed as a result of each inspection, testing, evaluation, or analysis.

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Dated: May 27, 2010

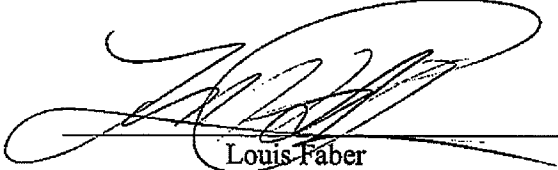
CERTIFICATION

LOUIS FABER declares as follows:

I am Associate General IP Counsel at Xerox Corporation, the plaintiff in this action. I have reviewed Xerox's Responses and Objections to Google Inc.'s and YouTube LLC's First Set of Interrogatories ("Responses and Objections"). The answers set forth in the Responses and Objections are true to the best of my current knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 27, 2010



Louis Faber

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May, 2010, the attached **XEROX'S RESPONSES AND OBJECTIONS TO GOOGLE INC.'S AND YOUTUBE LLC'S FIRST SET OF INTERROGATORIES** was served upon the below-named counsel of record at the address and in the manner indicated:

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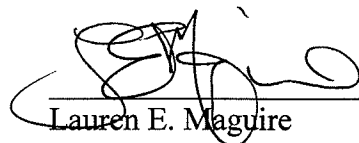
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