

EXHIBIT A

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 YAHOO INC.’S AND RIGHT MEDIA 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 Yahoo! Inc.’s and Right Media LLC’s First Set of Interrogatories to 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,

objections as to relevancy, materiality or admissibility of any document in subsequent proceedings or at the trial of this or any other action.

3. Xerox objects to the Interrogatories as overbroad, unduly burdensome and oppressive. Xerox objects to the Interrogatories to the extent they request “all” (or equivalent expressions) facts or information relating to a particular subject. Xerox’s responses to the Interrogatories will be based on a search of reasonable scope.

4. Xerox objects to the Interrogatories on the grounds to the extent that they are vague, ambiguous and unclear.

5. Xerox objects to the Interrogatories on the grounds and to the extent that they are unreasonably cumulative or duplicative.

6. Xerox objects to the Interrogatories on the grounds and to the extent that they seek identification and disclosure of information that is irrelevant and immaterial and/or that is not reasonably calculated to lead to the discovery of admissible evidence.

7. Xerox objects to the Interrogatories on the grounds and to the extent that they purport to require identification and disclosure of documents and information that were prepared in anticipation of litigation, constitute attorney work product, disclose mental impressions, conclusions, opinions or legal theories of any attorney for or other representative of Xerox, contain privileged attorney-client communications or are otherwise protected from disclosure under applicable privileges, laws or rules. Xerox hereby claims such privileges, protections and immunities to the extent implicated by each interrogatory, and excludes privileged and protected information to the extent and in the manner agreed upon by the parties. Any disclosure of such protected or privileged information is inadvertent shall not constitute a

waiver of any privilege or any other ground for objecting to discovery with respect to such information.

8. Xerox objects to the Interrogatories on the grounds and to the extent that they seek information not currently in Xerox's possession, custody or control.

9. Xerox objects to the Interrogatories to the extent that they call for information equally within the knowledge and possession of Defendants.

10. Xerox objects to the Interrogatories on the grounds and to the extent that they assume disputed facts or legal conclusions in crafting definitions or in describing the information requested. Xerox denies any such disputed facts or legal conclusions. Any information provided by Xerox with respect to any such Interrogatory is without prejudice to this objection and shall not constitute agreement with or waiver of any objection to such facts or legal conclusions.

11. Xerox objects to the Interrogatories on the grounds and to the extent that they constitute multiple subparts and should therefore be counted as separate interrogatories.

12. Xerox submits these responses to the Interrogatories without conceding the relevance or materiality of the subject matter of any of the information sought in these Interrogatories.

13. Consistent with Fed. R. Civ. P. 33(d), Xerox objects to providing responses to the Interrogatories that can be derived from documents that have been produced or will be produced (when requested in compliance with Rule 26) and where the burden to derive such information is substantially the same for Defendants as it is for Xerox.

14. Xerox objects to the Interrogatories on the grounds and to the extent that they prematurely seek expert discovery.

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

State in full the complete basis for Xerox's contention that Yahoo! and Right Media have infringed the patents-in-suit, including without limitation by providing a detailed claim chart that identifies each patent claim asserted against Yahoo! or Right Media, each thing or process alleged to have infringed such claim, where each limitation of such claim is present in such accused process or thing, and whether the presence of that limitation is asserted under the doctrine of equivalents.

Response to Interrogatory No. 1

As presently advised, Xerox identifies the following Yahoo! and Right Media products that infringe the patents in suit. Xerox reserves its right to supplement, revise or render more specific its response to Interrogatory No. 1.

'979 Patent Limitation Claim 1	'979 Patent Limitation Claim 18	Direct Infringement - Yahoo! Content Match, Yahoo! Search Marketing, Yahoo! Publisher Network, Y!Q Contextual Search and Right Media Exchange
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	The Yahoo! and Right Media products identified above run 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.	Each of the Yahoo! and Right Media products identified above defines and utilizes an organized classification of document content (e.g., webpage content) with classification identifiers corresponding to categories in the product's 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.	Each of the Yahoo! and Right Media products identified above employs algorithms to analyze webpages and to identify information in the webpage content for searching additional information (e.g., advertisements or other content) using the product's 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.	Each of the Yahoo! and Right Media products identified above 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 product's 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.	Each of the Yahoo! and Right Media products identified above automatically formulates queries to its information retrieval system for information (e.g., 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.
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'994 Patent Limitation Claim 9	Direct Infringement - Yahoo! Video and Yahoo! Shopping
A method for providing application interoperability and synchronization between heterogeneous document and data sources comprising steps of	
storing data in a first database memory;	<p>Yahoo! Video stores data (<i>e.g.</i>, user comments, reviews and/or ratings relating to hosted videos) in a database memory.</p> <p>Yahoo! Shopping stores data (<i>e.g.</i>, user comments, reviews and/or ratings relating to products for sale) in a database memory.</p>
performing data analysis operations using the data stored in the first database to generate data and analysis results;	<p>Yahoo! Video and Yahoo! Shopping 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.</p>
independently storing knowledge, in the form of documents, in a document database, including validating the accuracy of the knowledge and making the stored knowledge available across a network;	<p>Yahoo! Video independently stores information (<i>e.g.</i>, information relating to videos) in the form of documents in a document/video database, and validates that this information is accurate. This information is made available across the internet.</p> <p>Yahoo! Shopping independently stores information (<i>e.g.</i>, information relating to products for sale) 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>
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>Yahoo! Video and Yahoo! Shopping manage the flow of information between the first databases and the document databases to enable the integration of data and analysis results (<i>e.g.</i>, aggregate user ratings, average user ratings, numbers of comments and/or 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. 2

For each claim of the patents-in-suit that Xerox contends has been willfully infringed by Yahoo!, state in full the complete basis for Xerox's contention that Yahoo!'s alleged infringement has been willful.

Response to Interrogatory No. 2

Yahoo! and Right Media have withdrawn this interrogatory.

Interrogatory No. 3

For each claim of the patents-in-suit that Xerox contends has been willfully infringed by Right Media, state in full the complete basis for Xerox's contention that Right Media's alleged infringement has been willful.

Response to Interrogatory No. 3

Yahoo! and Right Media have withdrawn this interrogatory.

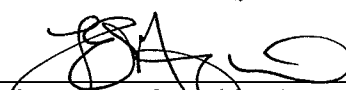
Interrogatory No. 4

State in full the complete basis for Xerox's contention that Xerox is entitled under 35 U.S.C. § 283 to an injunction to prevent the alleged infringement of the patents-in-suit by Yahoo! and Right Media.

Response to Interrogatory No. 4

Yahoo! and Right Media have withdrawn this interrogatory.

ASHBY & GEDDES,



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Dated: May 27, 2010

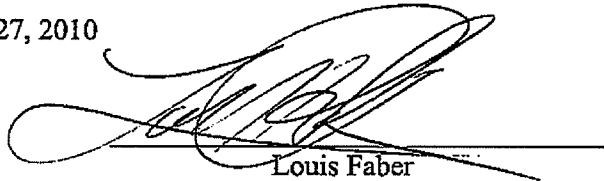
CERTIFICATION

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 Yahoo Inc.'s and Right Media 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 YAHOO INC.'S AND RIGHT MEDIA 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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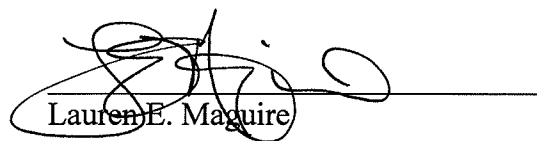

Lauren E. Maguire

EXHIBIT B

REDACTED
IN ITS
ENTIRETY

EXHIBIT C

REDACTED
IN ITS
ENTIRETY

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

XEROX CORPORATION,

Plaintiff-Counterclaim Defendant,

v.

GOOGLE INC., YAHOO! INC., RIGHT MEDIA
INC., RIGHT MEDIA LLC, YOUTUBE, INC.
AND YOUTUBE, LLC,

Defendants-Counterclaim Plaintiffs.

C.A. No. 10-136-LPS-MPT

**PLAINTIFF XEROX CORPORATION'S REVISED INITIAL CLAIM
CONSTRUCTIONS**

Pursuant to Paragraph 13 of the Court's June 15, 2010, Amended Scheduling Order, Plaintiff Xerox Corporation ("Xerox") hereby discloses without prejudice its preliminary proposed constructions for the asserted claims of U.S. Patent No. 6,778,979. Xerox reserves the right to amend or supplement these constructions in response to Defendants' proposed constructions and/or any subsequent development in this action.

Claim 1

Claim Language	Proposed Construction
A method for automatically generating a query from selected document content, comprising:	No construction required
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;	Identifying a set of categories that are defined in an ontology and that can be used to describe the subject matter of document content, each category having a corresponding identifying label, the identifying labels corresponding to categories of information in an information retrieval system.

<p>automatically identifying a set of entities in the selected document content for searching additional information related thereto using the information retrieval system;</p>	<p>Automatically identifying, in selected document content, one or more items with a recognized meaning (e.g., a person's name, a location, a medical term, or a graphics entity that may include image data, graphics data, audio data or video data).</p> <p>“Selected document content” may be all or part of the content of a document.</p>
<p>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</p>	<p>Automatically performing a semantic analysis on the selected document content to correlate that content with one or more of the categories established in the “defining” step and to assign one or more corresponding identifying labels to the selected document content.</p>
<p>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.</p>	<p>Automatically assembling a set of query data to be sent to the information retrieval system, the set of query data including data items corresponding to one or more entities identified in the “automatically identifying” step and one or more identifying labels assigned in the “automatically categorizing” step.</p>

Claim 2

Claim Language	Proposed Construction
<p>The method according to claim 1, further comprising limiting the query by adding terms relating to context information surrounding the set of entities in the selected document content.</p>	<p>The set of query data to be sent to the information retrieval system in the “automatically formulating” step of Claim 1 includes additional data items corresponding to contextual data derived from the selected document content surrounding the entities identified in the “automatically identifying” step of Claim 1.</p>

Claim 3

Claim Language	Proposed Construction
<p>The method according to claim 2, wherein the number of terms added is limited to a predefined number.</p>	<p>No construction required.</p>

Claim 5

Claim Language	Proposed Construction
The method according to claim 1, wherein the organized classification of document content is defined using a hierarchical organization.	The set of categories established in the “defining” step of Claim 1 includes at least one subcategory of a category.

Claim 10

Claim Language	Proposed Construction
The method according to claim 1, wherein each class in the organized classification of document content has associated therewith a characteristic vocabulary.	No construction required.

Claim 18

Claim Language	Proposed Construction
An article of manufacture for use in a computer system, comprising:	A computer program existent (permanently, temporarily, or transitorily) on any computer-usable medium such as on any memory device or in any transmitting device.
a memory	A device or system from which electronic data may be retrieved, including, but not limited to, hard disk drives, floppy disks (or diskettes), optical disks, magnetic tape, semiconductor memories such as RAM, ROM, PROMs, etc.
instructions stored in the memory for operating a method for automatically generating a query from selected document content, comprising:	No construction required.
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 as in Claim 1
automatically identifying a set of entities in the selected document content for searching information related thereto using the information retrieval system;	Same as in Claim 1

<p>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</p>	<p>Same as in Claim 1</p>
<p>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.</p>	<p>Same as in Claim 1</p>

Claim 19

Claim Language	Proposed Construction
<p>The article of manufacture according to claim 18, wherein the instructions stored in the memory further comprise limiting the query by adding terms relating to context information surrounding the set of entities in the selected document content.</p>	<p>Same as Claim 2</p>

Dated: February 9, 2011

CRAVATH, SWAINE & MOORE LLP

/s/ Richard J. Stark

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