

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

XEROX CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 10-136-LPS-MPT
)	
GOOGLE INC., YAHOO! INC., RIGHT)	
MEDIA INC., RIGHT MEDIA LLC,)	
YOUTUBE, INC., and YOUTUBE, LLC,)	
)	
Defendants.)	

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and District of Delaware Local Rule 30.1, Plaintiff Xerox Corporation (“Xerox”), by and through its attorneys, will take the deposition upon oral examination of the person or persons designated by Google Inc. and YouTube LLC (collectively, “Google”) to testify to information known or reasonably available to them regarding the matters described in Schedule A hereto. The deposition will commence on January 6, 2011, beginning at 9:00 a.m. and continue from day to day until completed. The deposition will be held at the offices of Cravath, Swaine & Moore LLP, 825 Eighth Avenue, New York, New York, or at such place as may be agreed upon by counsel for the parties. Google is requested to provide Xerox with the identity of each designated individual and the subject matter upon which each such individual is designated to testify no later than ten (10) days prior to the commencement of the deposition. The testimony obtained pursuant to this Notice may be used for any and all purposes authorized under the Federal Rules of Civil Procedure, and Xerox reserves the right to depose any witnesses designated by Google at any subsequent point in the litigation on other topics.

ASHBY & GEDDES

/s/ Lauren E. Maguire

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Dated: December 15, 2010

SCHEDULE A

Definitions

Xerox incorporates by reference the Definitions used in Xerox's First Set of Requests for the Production of Documents and Things, served on Google on April 23, 2010, as if they were set forth fully herein.

"Document Source" shall mean a location in which documents, information, data and/or other responsive material may be stored or from which documents, information, data and/or other responsive material may be retrieved by Google, including without limitation electronic repositories, data stores and back-up systems of any kind, and physical locations such as offices, files, storage areas, archives and the like.

"Collection Methodology and Process" shall mean the manner in which documents, data, information or other materials were collected by Google (including without limitation any third party acting on Google's behalf) from a given Document Source in this litigation. In the case of collection from a given electronic Document Source, the Collection Methodology and Process shall include whether Google employed the procedures set forth in the draft Agreement on the Production of Documents as sent by Xerox to Google on September 30, 2010 to collect documents from that Document Source and any departures from those procedures, including without limitation any electronic search procedures or other alternate procedures employed by Google to collect documents from that Document Source.

Deposition Topics

1. The location, storage and retention of documents concerning the design, development, operation, structure or use of any or all of Google's Accused Products, including:

- a. source code for the Accused Products;
- b. design and development documents;
- c. data flow or logic diagrams;
- d. documents describing all dependencies on your other products,
- e. services, facilities and/or computer software programs whether or not a formal or documented application programming interface ("API");
- f. class and object definitions;
- g. programmers' Source Code comments and annotations;
- h. graphical user interface mockups;
- i. unit test plans, unit test cases and unit test results;
- j. system test plans, system test cases and system test results;
- k. integration test plans, integration test cases and integration test results;
- l. functional verification test plans, test cases and test results;
- m. performance test plans, test cases and test results;
- n. application programming interfaces ("APIs");
- o. any entries in any Source Code management system or version control system;
- p. design change documents;
- q. descriptions of errors or "bugs" and fixes, corrections and "workarounds" concerning your Accused Products;

- r. any descriptions of the operation of your Accused Products;
- s. any user manuals, reference manuals, help guides, web manuals, tutorials, training manuals or videos describing or related to your Accused Products, whether in electronic or hardcopy form, and all amendments, revisions or changes thereto;
- t. and documents describing ways in which your Accused Products classify or categorize document content, employ semantic analysis of document content, and/or utilize or employ ontologies.

2. The Document Sources searched by Google in response to Xerox's Requests for the Production of Documents in this litigation and the Collection Methodology and Process used by Google to search each such Document Source.