

EXHIBIT B: Selected Document Requests and Interrogatories of Google and AFP's Responses to SameGoogle's Document Request No. 1:

A copy of each separate copyrighted work owned by AFP that AFP contends Google News has used in manner that infringes any AFP copyright. (Henceforth, these will be referred to as the "Allegedly Infringed Works.")

AFP's Response to Document Request No. 1:

AFP objects to this Request as nonsensical, but will respond as if there is an "a" between "in" and "manner." AFP objects to this Request because discovery is ongoing, responsive information is in Google's possession, and a complete response is not possible until complete discovery from Google. AFP objects to this request to the extent that it calls for the production of documents not in AFP's possession, custody or control. AFP also objects to this Request as ambiguous, overly broad and unduly burdensome.

Without waiving or limiting these Specific Objections or any General Objection, AFP will search for and produce responsive, non-privileged documents that are within its possession, custody or control, to the extent that any exist, which documents may include those produced at AFP000001-AFP000582.

Google's Document Request No. 2:

A copy of each separate copyrighted work owned by AFP that AFP contends Google News may have used in manner that infringes any AFP copyright. (Henceforth, these will be referred to as the "Potentially Allegedly Infringed Works.")

AFP's Response to Document Request No. 2:

AFP objects to this Request as nonsensical, but will respond as if there is an "a" between "in" and "manner." AFP objects to this Request because discovery is ongoing, responsive information is in Google's possession, and a complete response is not possible until complete discovery from Google. AFP objects to this request to the extent that it calls for the production of documents not in AFP's possession, custody or control. Additionally, AFP objects to this Request as ambiguous, overly broad and unduly burdensome. AFP also objects to this Request because it calls for speculation. AFP further objects to this Request as calling for the production of information protected by the attorney-client, attorney work-product or other applicable privilege.

Without waiving or limiting these Specific Objections or any General Objection, AFP will search for and produce responsive, non-privileged documents that are within its possession, custody or control, to the extent that any exist, which documents may include those produced at AFP000001-AFP000582.

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Google's Interrogatory No. 1:

Identify by date, author, headline or caption, and contents of each, each separate copyrighted work owned by AFP that AFP contends Google News has used in manner that infringes any AFP copyright. (Henceforth, these will be referred to as the "Allegedly Infringed Works.")

AFP's Response to Interrogatory No. 1:

In addition to the General Objections set forth above, AFP objects to this Interrogatory as nonsensical, but will respond as if there is an "a" between "in" and "manner." AFP objects to this Interrogatory because discovery is ongoing, responsive information is in Google's possession, and a complete response is not possible until complete discovery from Google.

Subject to and without waiving its specific or general objections, AFP answers as follows:

AFP reasonably believes that the answer to this Interrogatory may be derived or ascertained from AFP's business records or from an examination, audit or inspection of such business records, including a compilation, abstract or summary thereof, and the burden of deriving or ascertaining the answer is substantially the same for Google as for AFP. Accordingly, AFP reserves its right under Fed. R. Civ. P. 33(d) to specify the records from which the answer may be derived or ascertained and to afford Google reasonable opportunity to examine, audit or inspect such records at the location or locations where they are ordinarily maintained and to make copies, compilations, abstracts or summaries thereof. To this end, AFP specifies the following records produced at: AFP000001-AFP000582.

Google's Interrogatory No. 2:

Identify by date, author, headline or caption, and contents of each, each separate copyrighted work owned by AFP that AFP contends Google News may have used in manner that infringes any AFP copyright. (Henceforth, these will be referred to as the "Potentially Allegedly Infringed Works.")

AFP's Response to Interrogatory No. 2:

In addition to the General Objections set forth above, AFP objects to this Interrogatory as nonsensical, but will respond as if there is an "a" between "in" and "manner." AFP objects to this Interrogatory because discovery is ongoing, responsive information is in Google's possession, and a complete response is not possible until complete discovery from Google. Further, AFP objects to this Interrogatory as ambiguous, overly broad and unduly burdensome. AFP also objects to this Interrogatory because it calls for speculation. AFP further objects to this Interrogatory as calling for the production of information protected by the attorney-client, attorney work-product or other applicable privilege.

Subject to and without waiving its specific or general objections, AFP answers as follows:

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