

**EXHIBIT C: Selected Requests for Admissions of Google and AFP's Responses to Same**Google's Request for Admission No. 23:

President George W. Bush is quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 23:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 24:

President Hamid Karzai of Afghanistan is quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 24:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 25:

Chairman of the Federal Reserve Alan Greenspan is quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 25:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 26:

FDA public health advisories are quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 26:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 27:

Former World Bank President James Wolfensohn is quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 27:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 28:

French President Jacques Chirac is quoted in headlines and story leads that AFP claims Google has infringed by copying.

**EXHIBIT C: Selected Requests for Admissions of Google and AFP's Responses to Same**

AFP's Response to Request No. 28:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 29:

The late Pope John Paul II is quoted in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 29:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 30:

President George W. Bush is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 30:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 31:

President Hamid Karzai of Afganistan is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 31:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 32:

Chairman of the Federal Reserve Alan Greenspan is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 32:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 33:

FDA public health advisories are accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 33:

Without reference to a specific article, AFP is unable to admit or deny this Request.

**EXHIBIT C: Selected Requests for Admissions of Google and AFP's Responses to Same**

Google's Request for Admission No. 34:

Former World Bank President James Wolfensohn is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 34:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 35:

French President Jacques Chirac is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 35:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 36:

The late Pope John Paul II is accurately paraphrased in headlines and story leads that AFP claims Google has infringed by copying.

AFP's Response to Request No. 36:

Without reference to a specific article, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 37:

The AFP Articles and AFP Photos that AFP alleges Google News has copied were posted on publicly accessible Internet web sites with the authorization of AFP.

AFP's Response to Request No. 37:

Without reference to specific articles, photos and publicly accessible Internet web sites, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 38:

The headlines displayed by Google News that AFP claims are infringing were posted on publicly accessible Internet web sites with the authorization of AFP

AFP's Response to Request No. 38:

Without reference to specific headlines and publicly accessible Internet web sites, AFP is unable to admit or deny this Request.

**EXHIBIT C: Selected Requests for Admissions of Google and AFP's Responses to Same**

Google's Request for Admission No. 39:

The parts of lead paragraphs displayed by Google News that AFP claims are infringing were posted on publicly accessible Internet web sites with the authorization of AFP.

AFP's Response to Request No. 39:

Without reference to specific lead paragraphs and publicly accessible Internet web sites, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 40:

The thumbnails displayed by Google News that AFP claims are infringing are based on photographs posted on publicly accessible Internet web sites with the authorization of AFP.

AFP's Response to Request No. 40:

Without reference to specific photographs and publicly accessible Internet web sites, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 47:

AFP does not accuse Google News of infringing AFP's rights of first publication.

AFP's Response to Request No. 47:

Without reference to a specific article, headline, lead paragraph or photograph, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 71:

The AFP Articles at issue in this case are news articles.

AFP's Response to Request No. 71:

Without reference to specific news articles, AFP is unable to admit or deny this Request. AFP does, however, admit that it publishes news articles.

Google's Request for Admission No. 72:

The AFP Photos at issue in this case are news photos.

AFP's Response to Request No. 72:

Without reference to specific photos, AFP is unable to admit or deny this Request. AFP does, however, admit that it publishes news photos.

Google's Request for Admission No. 73:

AFP Articles are intended to report with precision the facts stated therein.

**EXHIBIT C: Selected Requests for Admissions of Google and AFP's Responses to Same**

AFP's Response to Request No. 73:

Without reference to specific news articles, AFP is unable to admit or deny this Request. AFP does, however, admit that it publishes news articles that included reported facts and that it aims to publish articles that are as precise as possible.

Google's Request for Admission No. 74:

AFP Articles are intended to report accurately the facts stated therein.

AFP's Response to Request No. 74:

Without reference to specific news articles, AFP is unable to admit or deny this Request. AFP does, however, admit that it publishes news articles that included reported facts and that it aims to publish articles that are as accurate as possible.

Google's Request for Admission No. 75:

AFP Photos are intended to depict with precision their subjects.

AFP's Response to Request No. 75:

AFP admits that it publishes photos that depict various events and subjects, however, AFP is unable to admit or deny this Request, as phrased, without reference to specific photos.

Google's Request for Admission No. 76:

AFP Photos are intended to depict their subjects with accuracy.

AFP's Response to Request No. 76:

AFP admits that it publishes photos that depict various events and subjects, however, AFP is unable to admit or deny this Request, as phrased, without reference to specific photos.

Google's Request for Admission No. 90:

AFP Articles are intended to present the news accurately.

AFP's Response to Request No. 90:

Without reference to specific articles, AFP is unable to admit or deny this Request.

Google's Request for Admission No. 91:

AFP Photos are intended to present the news accurately.

AFP's Response to Request No. 91:

Without reference to specific photographs, AFP is unable to admit or deny this Request.