

Appendix A:
Google's Chart of Claims with Key Grounds for Dismissal

<i>Count</i>	<i>Cause of Action</i>	<i>Key Ground for Dismissal</i>
1 & 2	RICO	No enterprise; no control; fraud not pleaded with particularity; no pattern; no conspiracy; no reliance; no proximate causation.
3	Cybersquatting	No allegation that Google owns or operates any allegedly infringing domain names.
4	Trademark Infringement	No allegation that Google knew or should have known of trademark infringement.
5	False Designation of Origin	No allegation that Google uses the domain names "on or in connection with any goods or services."
6	Trademark Dilution	No allegation that Plaintiffs' marks are famous.
7	State Law Deceptive Trade Practices	Same grounds for dismissal as Lanham Act claims.
8	Declaratory Judgment	Redundant with Plaintiffs' other claims for relief.
9	Common Law Trademark Violation	Same grounds for dismissal as Lanham Act claims.
10	Contributory Trademark Infringement	No allegation that Google knew or should have known of trademark infringement.
11	Vicarious Trademark Infringement	Plaintiffs' theory of liability was rejected by the Seventh Circuit in the <i>Hard Rock Cafe</i> case.
12	Intentional Interference with Current and Prospective Economic Advantage	No allegation of a particular business expectancy or contract with a specific third party.
13	Unjust Enrichment	Based upon inadequately-pleaded allegations of fraud.
14	Civil Conspiracy	Based upon inadequately-pleaded allegations of fraud.