

EXHIBIT

A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERICH SPECHT, an individual and doing business)	
as ANDROID DATA CORPORATION, and THE)	
ANDROID'S DUNGEON INCORPORATED,)	
)	
Plaintiffs/Counter-Defendants,)	
v.)	Civil Action No. 09-cv-2572
)	
GOOGLE INC.,)	Judge Harry D. Leinenweber
)	
Defendant/Counter-Plaintiff.)	

NOTICE OF DEPOSITION

TO: Herbert H. Finn
 Jeffrey P. Dunning
 GREENBERG TRAURIG, LLP
 77 West Wacker Drive, Suite 3100
 Chicago, IL 60660

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs Erich Specht, an individual and doing business as Android Data Corporation and The Android's Dungeon Inc., by their counsel, will take the depositions of the following individuals at the following dates, times and locations and continuing until completed. The depositions will be upon oral examination before a certified court reporter, notary public or other officer duly authorized to administer oaths, and will be recorded by stenographic, audio and/or video graphic means.

<u>Deponent</u>	<u>Date and Time</u>	<u>Location</u>
Chris White (by Subpoena)	May 25, 2010, 9:30 a.m.	Liner, Grode, Stein LLP, 199 Fremont Street, 20th Floor, San Francisco, CA 94105
Andy Rubin	May 26, 2010, 9:30 a.m.	Bell & Myers, 2055 Junction Avenue, Suite 200, San Jose, CA 95131
Rule 30(b)(6) Deposition	May 27, 2010, 9:30 a.m.	Bell & Myers, 2055 Junction Ave. Suite 200, San Jose, CA 95131

ERICH SPECHT, an individual and doing business
as ANDROID DATA CORPORATION, and
THE ANDROID'S DUNGEON INCORPORATED

By: P. Andrew Fleming
One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John Haarlow, Jr.
NOVACK AND MACEY LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900
Doc. #345331

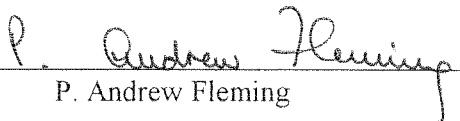
Martin J. Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200

CERTIFICATE OF SERVICE

P. Andrew Fleming, an attorney, certifies that he served the foregoing Notice of Depositions by causing a true and correct copy to be delivered by e-mail to:

Herbert H. Finn (finnh@gtlaw.com)
Jeffrey P. Dunning (dunning@gtlaw.com)
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

this 30th day of April, 2010.



P. Andrew Fleming

EXHIBIT

B

P. Andrew Fleming

From: FinnH@gtlaw.com
Sent: Wednesday, May 12, 2010 3:08 PM
To: P. Andrew Fleming
Cc: John Shonkwiler; John B. Haarlow; DunningJ@gtlaw.com; NelsonC@gtlaw.com; marty@m@villageinvestments.com
Subject: Specht/Google - Rubin Deposition

Andrew,

Can we proceed with Mr. Rubin's deposition on July 9th?

Herb Finn

Herbert H. Finn
Shareholder
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.8427 | Fax 312.456.8435
FinnH@gtlaw.com | www.gtlaw.com



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P. Andrew Fleming

From: P. Andrew Fleming
Sent: Wednesday, May 12, 2010 12:33 PM
To: 'FinnH@gtlaw.com'
Cc: John Shonkwiler; John B. Haarlow; marty@villageinvestments.com; DunningJ@gtlaw.com; NelsonC@gtlaw.com
Subject: RE: Specht/Google - Rubin Deposition

Herb, June 3rd does not work. Please let me know if any of the following dates are available: June 8,9,10, 24,25, 28,29 or 30 or July 1,5,6,7 or 8. Andrew

P. Andrew Fleming

andrewf@novackmacey.com

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312.419.6928 F

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From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]
Sent: Wednesday, May 12, 2010 12:24 PM
To: P. Andrew Fleming
Cc: John Shonkwiler; John B. Haarlow; marty@villageinvestments.com; DunningJ@gtlaw.com; NelsonC@gtlaw.com
Subject: Specht/Google - Rubin Deposition

Andrew,

As indicated in my prior email, the availability for Mr. Rubin's deposition in June is limited. That said, we can proceed with Mr. Rubin's deposition on June 3rd. Please confirm that we are proceeding on that date.

Herb Finn

Herbert H. Finn
Shareholder
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.8427 | Fax 312.456.8435
FinnH@gtlaw.com | www.gtlaw.com



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From: P. Andrew Fleming [mailto:andrewf@novackmacey.com]
Sent: Wednesday, May 12, 2010 9:05 AM
To: Finn, Herbert (Shld-Chi-IP/Tech)
Cc: John Shonkwiler; John B. Haarlow; martym@villageinvestments.com; Dunning, Jeffrey (Assoc-Chi-IP/Tech); Nelson, Cameron (Assoc-Chi-IP/Tech)
Subject: RE: Specht/Google - Depositions

Herb, I will be taking the deposition of Mr. Rubin. I will not be taking the deposition of Lucasfilms. Accordingly, it is wrong for you to assume that we do not want to take Mr Rubin's deposition on June 2nd because we want to conduct the deposition of Lucasfilms on that date. Also, because of Lucasfilms' previous objection to the Subpoena served upon it, we anticipate that the deposition of Lucasfilms may not go forward absent a Court Order and that any such Order may not be obtained prior to June 2nd. Accordingly, please provide us with alternative dates for Mr Rubin's deposition in June. Sincerely, Andrew

P. Andrew Fleming

andrewf@novackmacey.com

312.419.6900 T
312.419.6928 F

novack-macey

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From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]
Sent: Tuesday, May 11, 2010 8:47 PM
To: P. Andrew Fleming
Cc: John Shonkwiler; John B. Haarlow; martym@villageinvestments.com; DunningJ@gtlaw.com; NelsonC@gtlaw.com
Subject: Specht/Google - Depositions

Andrew,

We are a bit confused.

This morning you asked the Court to direct us to look for deposition dates during the week of May 31st. The Court appropriately indicated that its involvement was, at best, premature. Nonetheless, in effort to work together on scheduling, within hours, we provided you an available date for Mr. Rubin's deposition -- June 2nd. Two hours after receiving our email, John Haarlow then provides us notice of a subpoena being issued to Lucasfilms -- for a deposition on that same day in the San Francisco area. Notably, the subpoena to Lucasfilms was executed today and accordingly we assume that it was, at best, in the process of being served as of the time we provided you Mr. Rubin's availability. Fifteen minutes later, you indicate that you are not available to conduct the deposition of Mr. Rubin on June 2nd -- presumably because Plaintiffs want to conduct the deposition of Lucasfilms on that date.

Your decision to forego the deposition of Mr. Rubin for an attempt to take the deposition of Lucasfilms is curious at best -- especially after you sought some sort of Court involvement in arranging this deposition. The Lucasfilms deposition is not yet set for June 2nd and, based upon Lucasfilms' prior positions and conduct, there is little reason to believe that it will appear without at least some further discussion amongst counsel and/or Court involvement. All of which makes the June 2nd date for Lucasfilms deposition extremely unlikely.

Moreover, I had previously indicated that the availability to conduct Mr. Rubin's deposition was limited in June. If we do not proceed on June 2nd, due to scheduling issues, there is a possibility that we will not be able to proceed with his deposition until July. Accordingly, we ask that you reconsider conducting Mr. Rubin's deposition on June 2nd.

As to the Rule 30(b)(6) deposition, we are working on available dates and will advise you when we have more clarity on the issue.

Herb Finn

Herbert H. Finn
Shareholder
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Tel 312.456.8427 | Fax 312.456.8435
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From: P. Andrew Fleming [mailto:andrewf@novackmacey.com]
Sent: Tuesday, May 11, 2010 2:52 PM
To: Finn, Herbert (Shld-Chi-IP/Tech); John Shonkwiler; John B. Haarlow
Cc: Dunning, Jeffrey (Assoc-Chi-IP/Tech); marty@m@villageinvestments.com
Subject: RE: Specht/Google - Depositions

Herb, We are not available to take Mr Rubin's deposition on June 2nd. Please let us know what alternative dates are available for the deposition in June. Also, please let us know what dates are available for the deposition(s) of the Rule 30(b)(6) witness(es). Andrew

P. Andrew Fleming

andrewf@novackmacey.com

312.419.6900 T
312.419.6928 F

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From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]
Sent: Tuesday, May 11, 2010 12:27 PM
To: P. Andrew Fleming; John Shonkwiler; John B. Haarlow
Cc: DunningJ@gtlaw.com
Subject: Specht/Google - Depositions

Counsel,

In view of your statements in Court this morning regarding deposition dates, we have investigated Mr. Rubin's availability for dates in the week following May 26th. We confirm that Mr. Rubin is available for deposition on June 2nd. In addition, Mr. Rubin requests that the deposition be conducted at the offices of Greenberg Traurig at:

Greenberg Traurig, LLP
1900 University Avenue, 5th Floor
East Palo Alto, CA 94303

Should we not be able to proceed on June 2nd, the availability to conduct Mr. Rubin's deposition becomes more limited. Please confirm that we are proceeding on June 2nd.

Herb Finn

Herbert H. Finn
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FinnH@gtlaw.com | www.gtlaw.com



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EXHIBIT

C

John B. Haarlow

From: FinnH@gtlaw.com
Sent: Sunday, June 06, 2010 9:40 PM
To: P. Andrew Fleming
Cc: John B. Haarlow; John Shonkwiler; DunningJ@gtlaw.com; NelsonC@gtlaw.com; martym@villageinvestments.com
Subject: Specht/Google - Depositions

Andrew,

My apologies for the slower response, but as Jeff advised I was in an all day mediation on Friday.

In any event, the proposed date for conducting the deposition is unrelated to your intent to seek an extension of the oral discovery period. To summarize, you are taking a 30(b)(6) witness on July 9. We have offered July 14 for a second Rule 30(b)(6) witness. Despite being available on July 14, you are refusing to proceed on that day. While we can not keep that date open indefinitely, we will keep it open for a while longer should you reconsider.

As to your intent to seek an extension of oral discovery, we remain of the opinion that it is premature at best. Your cited need for follow-up depositions is pure speculation. There is no reason to believe that the witnesses being presented will not be fully responsive. Accordingly, at this time we will not agree to an extension as you request.

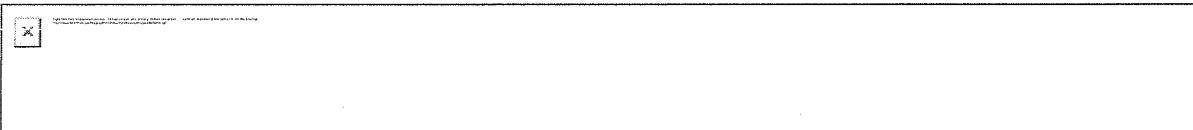
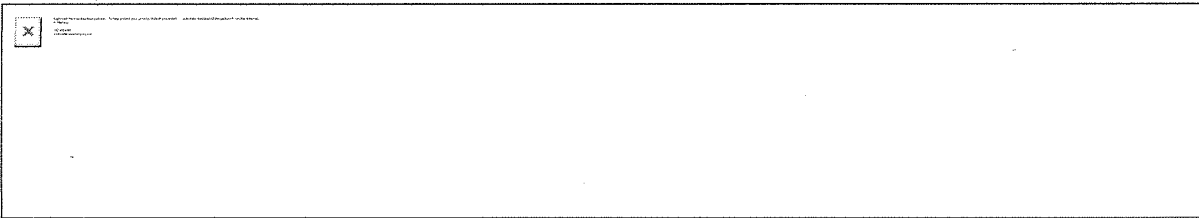
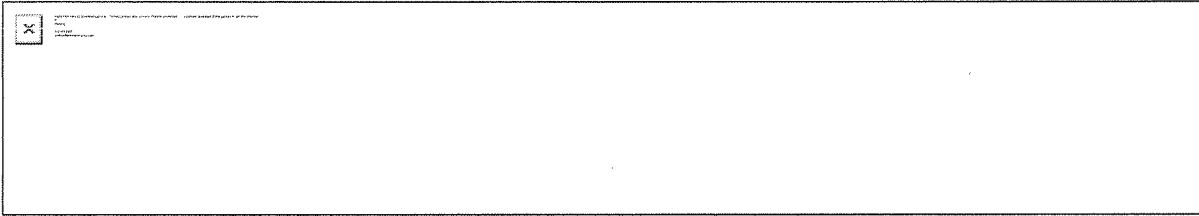
On another note, please confirm that we will receive a substantive response to Interrogatory No. 13 and the correspondence with 3rd parties as Ordered by the Court by the end of the week, namely June 11th.

Herb Finn

Herbert H. Finn, Esq.
GREENBERG TRAURIG LLP
77 West Wacker Drive
Chicago, Illinois 60601
312/456-8400 (phone)
312/456-8435 (fax)
finnh@gtlaw.com (email)

From: P. Andrew Fleming <andrewf@novackmacey.com>
To: Finn, Herbert (Shld-Chi-IP/Tech)
Cc: John B. Haarlow <JHaarlow@novackmacey.com>; John Shonkwiler <jshonkwiler@novackmacey.com>; martym@villageinvestments.com <martym@villageinvestments.com>; Dunning, Jeffrey (Assoc-Chi-IP/Tech); Nelson, Cameron (Assoc-Chi-IP/Tech)
Sent: Fri Jun 04 10:28:05 2010
Subject: RE: Specht/Google - Depositions

Herb, The reason we need an extension of the discovery cut off date if you will not provide a 30(b)(6) witness for deposition in June should be obvious. We need more than a mere 16 days to conduct any follow up discovery arising from the 30(b)(6) deposition. Indeed, the suggestion that such discovery could be conducted is belied your claim that Google witnesses are generally unavailable for months at a time. Regardless, we will agree to the July 14 deposition date only if you agree to an extension of the discovery cut off date to September 15, 2010. Please let me know your position by the close of business today. Sincerely, Andrew



From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]

Sent: Thursday, June 03, 2010 4:12 PM

To: P. Andrew Fleming

Cc: John B. Haarlow; John Shonkwiler; martym@villageinvestments.com; DunningJ@gtlaw.com; NelsonC@gtlaw.com

Subject: Specht/Google - Depositions

Andrew,

Your complaints about the proposed date of July 14th being 2 months after the Notice being served are unwarranted. Remember, it was Plaintiffs who unilaterally withdrew the previously noticed date for the Rule 30(b)(6) deposition. When Plaintiffs withdrew those dates, we had advised you that scheduling depositions of certain witnesses in June would be difficult. As such, our proposed date should be no surprise. Further, you are taking the deposition of a Rule 30(b)(6) witness (Mr. Rubin) that will cover a significant portion of the topics identified in the Notice prior to July 14th.

Indeed, it appears that you are creating an issue merely to justify a request for an extension of oral discovery. Yet, you have not identify why such an extension is required. The proposed July 14th date is prior to close of oral discovery. And nothing has prevented Plaintiffs from arranging or conducting other depositions in June that they may desire to take. If Plaintiffs have a genuine need for and basis to support extending oral discovery, we are certainly willing to consider and discuss it as required under Rule 37.

As you confirm your availability to proceed with the deposition on July 14th, please confirm that we are on that date -- without an extension of oral discovery attached.

Herb Finn

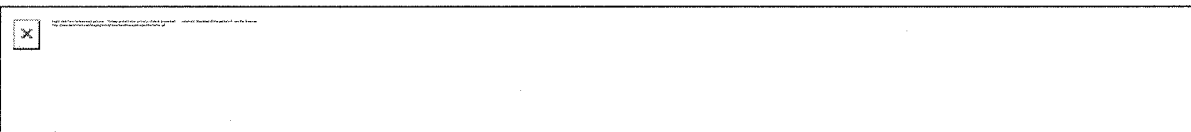
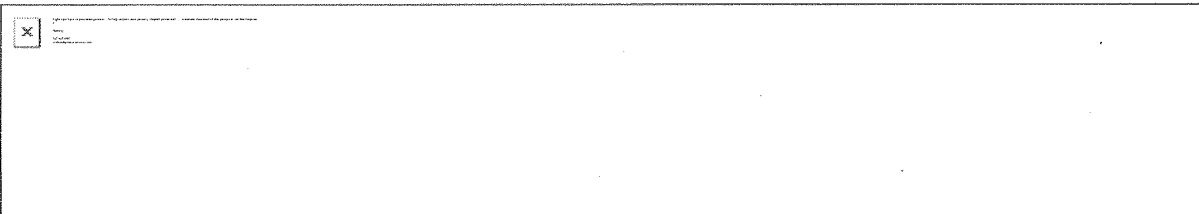
Herbert H. Finn
Shareholder



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From: P. Andrew Fleming [mailto:andrewf@novackmacey.com]
Sent: Thursday, June 03, 2010 1:19 PM
To: Finn, Herbert (Shld-Chi-IP/Tech)
Cc: John Shonkwiler; John B. Haarlow; Dunning, Jeffrey (Assoc-Chi-IP/Tech); Nelson, Cameron (Assoc-Chi-IP/Tech); martym@villageinvestments.com
Subject: RE: Specht/Google - Depositions

Herb, We will proceed with Mr Rubin's deposition on July 9, 2010 at 8.30am. Your proposed date for the other 30(b)(6) witness is unacceptable, however. As you know, we served the Notice for that deposition on May 7, 2010. For you now to offer a date that is 2 months after the Notice is ridiculous. We, therefore, propose the following two alternatives. Either: 1) provide us with proposed dates for the 30(b)(6) deposition in June; or 2) agree to a 45 day extension of the discovery cut off date and we will take the deposition on July 14, 2010. Please let us know your response by close of business tomorrow. Otherwise, we will file an appropriate Motion with the Court. Sincerely. Andrew



From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]
Sent: Thursday, June 03, 2010 8:06 AM
To: P. Andrew Fleming
Cc: John Shonkwiler; John B. Haarlow; DunningJ@gtlaw.com; NelsonC@gtlaw.com
Subject: Specht/Google - Depositions

Andrew,

While we understand that traffic difficulties may exist, we will accommodate your request and begin Mr. Rubin's deposition at 8:30 am on July 9th at our East Palo Alto offices. Mr. Rubin will be a Rule 30(b)(6) witness for many of the topics identified in the Notice. We will advise of which particular topics prior to the deposition.

In addition, we propose proceeding with Rule 30(b)(6) witness on other topics identified in the Notice on July 14th. Again, we can proceed at our offices. Please confirm.

Herb Finn

Herbert H. Finn
Shareholder
Greenberg Traurig, LLP | 77 West Wacker Drive | Suite 3100 | Chicago, IL 60601
Tel 312.456.8427 | Fax 312.456.8435
FinnH@gtlaw.com | www.gtlaw.com



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EXHIBIT

D

John B. Haarlow

From: FinnH@gtlaw.com
Sent: Tuesday, May 11, 2010 12:27 PM
To: P. Andrew Fleming; John Shonkwiler; John B. Haarlow
Cc: DunningJ@gtlaw.com
Subject: Specht/Google - Depositions

Counsel,

In view of your statements in Court this morning regarding deposition dates, we have investigated Mr. Rubin's availability for dates in the week following May 26th. We confirm that Mr. Rubin is available for deposition on June 2nd. In addition, Mr. Rubin requests that the deposition be conducted at the offices of Greenberg Traurig at:

Greenberg Traurig, LLP
1900 University Avenue, 5th Floor
East Palo Alto, CA 94303

Should we not be able to proceed on June 2nd, the availability to conduct Mr. Rubin's deposition becomes more limited. Please confirm that we are proceeding on June 2nd.

Herb Finn

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EXHIBIT

E

John B. Haarlow

From: FinnH@gtlaw.com
Sent: Friday, January 29, 2010 3:25 PM
To: John Shonkwiler
Cc: P. Andrew Fleming; John B. Haarlow; DunningJ@gtlaw.com
Subject: Specht/Google

John:

This is in response to your below email and in furtherance of Mr. Haarlow's e-mail dated January 12, 2010. Our response is in order of the issues raised in your email.

1. We are not now authorized to accept service of any subpoena in this matter on behalf of Christopher White.
2. As we've advised you previously, it is Google's position that Investigative Network's invoices for work performed on behalf of Google relating to the issues involved in this litigation are not relevant to any claim or defense in this litigation, and moreover are subject to at least the work product immunity and therefore protected from discovery. Your asserted basis of relevance for these records--that they would purportedly "show what Investigative Networks was engaged to accomplish"--is amply demonstrated by the reports themselves which Investigative Network prepared for Google and which have already been produced to you. However, in the interest of avoiding further disputes over this issue, Investigative Network is willing to produce copies of its invoices issued to Google for work performed relating to those reports and/or this litigation, provided that such production is not intended as, and does not constitute, a waiver of any applicable privilege or immunity that may attach to any other information or documentation in the possession of either Investigative Network or Google. Subject to your acknowledgement that such production of the requested invoices do not constitute waiver, we will produce copies of those records in due course.
3. With respect to the "Android, Inc. servers or data," your question presumes that the "Android, Inc. servers or data" were in existence prior to the filing of this case and remain in existence now -- which according to our investigation does not appear to be the case. As we have already advised you, our investigation of this issue, which included consulting with both Google's information technology personnel as well as former staff of Android, Inc., including Mr. Rubin, determined that neither any Android, Inc. server(s) nor any data from such server(s) appear to have been retained by Google. Simply put, we have spoken to the individuals who should know if such server(s) and/or data existed, and have been told that they do not. We believe that our efforts to investigate whether any such server(s) or data from such server(s) exist within Google's possession, custody or control have been more than adequate, and that no further investigation is necessary. Moreover, in the highly unlikely event that any such data may exist on a personal (non-Google) computer owned by any of the titular "Android, Inc. Founders" (none of whom, except for Mr. Rubin, were actually involved in the founding of Android, Inc.), those respective individuals' personal (non-Google) computers are not within Google's possession, custody or control.
4. We continue to process Google's ESI and expect to begin producing responsive ESI documentation next week.
5. With regard to Plaintiffs' Document Requests No. 3-7, while those requests may be "relevant" to the question of whether the "Founders" or Android, Inc. are subject to personal jurisdiction in the Northern District of Illinois, that question is not at issue in (let alone relevant to) this litigation. Nor, is Google "insisting" that they be sued prior to completing discovery. Google is not insisting that any other party be brought into this frivolous litigation. Quite the contrary is true -- as it was Google who sought dismissal of all of the former defendants. Indeed, after granting Google's Motion to Dismiss, the Court then granted Plaintiffs leave to reassert their trademark-related claims against Android, Inc. and those particular individuals by October 6, 2009. Plaintiffs chose not to do so. Furthermore, the particular requests at issue are directed to documents wholly unrelated to those individuals' employment with Google, and therefore such documents (even if they exist) are not within Google's possession, custody or control. More importantly, Plaintiffs have yet to identify a single legitimate factual basis for any claims that they might assert against any of those individuals for any trademark-related cause of action--which claims were previously dismissed by the Court for failure to state a claim. The facts and law haven't changed in these passing months -- Plaintiffs didn't have any basis when they originally filed against those former defendants and they still don't.
6. As stated in our objections to Plaintiffs' Request No. 27, that request is overly broad and unduly burdensome, to the extent that its scope is not limited to "market research" relating to the ANDROID trademark. Your request as drafted

seeks any and all "market research" (whatever that means) relating to any aspect of the Android OS software, including "market research" which may relate solely to the value of technological or functional aspects of the Android OS software and/or Android-enabled devices. While you summarily state that Google's objections are "wholly unfounded," you fail to identify any basis for relevance of any "market research" relating to technological or functional aspects of the Android OS software, and not to the ANDROID trademark itself. To the extent that Google is in possession of "market research" that relates to "any expected and/or actual benefit to Google" resulting from Google's use and/or promotion of the ANDROID trademark, Google will produce any such documents located after a reasonable search. As Plaintiffs can not identify any basis as to why "market research" having no relationship to the value of the ANDROID trademark is relevant to any claim or defense in this matter, Google stands by its objections as to the remainder of this request.

7. Additionally, with regard to item nos. 5 and 6 in Mr. Haarlow's January 12, 2010 e-mail, after giving serious consideration to your suggested list of custodians for e-mail and electronic document searching, at this point, Google is not conducting custodial searches of ESI created or maintained by Larry Page, Sergey Brin, David Drummond, or Alan Eustace. Our investigation has determined that none of these individuals had any substantive involvement in Google's decision to adopt or maintain the ANDROID trademark. To the extent there is any documentation relating to some minimal involvement by those individuals, those documents should be uncovered by the searches being conducted with respect to the other managerial/executive custodians, who are involved, such as Mr. Rubin. As you are no doubt aware, discovery of a corporation's senior level executives (particularly in a Fortune 500 public company having more than 10,000 employees) is highly disfavored, particularly when any relevant information is available from less senior level executives within an organization. Accordingly, and in view of their lack of any substantive participation in either of the decisions which you've identified, Google does not agree to search ESI associated with its co-founders, co-Presidents and Directors (Page and Brin), Senior Vice President, Corporate Development and Chief Legal Officer (Drummond) and Senior Vice President, Engineering & Research (Eustace). Google may be willing to re-evaluate its position on this issue at a later date, if Plaintiffs identify information in either Google's earlier productions and/or its forthcoming production of ESI that would justify a limited search of ESI associated with any of these individuals.

Finally, we wish to bring to your attention the fact that, despite our agreement early on that the parties would include certain available metadata as part of their production of ESI, we note that Plaintiffs' ESI production appears to lack any metadata other than the beginning and ending Bates numbers. We are most particularly interested in metadata relating to document creation or transmittal dates. We would appreciate it if you could look into this issue and let us know if Plaintiffs are able to provide additional metadata in accordance with our earlier agreement.

We trust that we have addressed the issues raised in your January 27th email, but remain available to discuss any of these issues further.

Herb Finn

Herbert H. Finn
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From: John Shonkwiler [mailto:jshonkwiler@novackmacey.com]
Sent: Wednesday, January 27, 2010 9:51 AM
To: Finn, Herbert (Shld-Chi-IP/Tech); Dunning, Jeffrey (Assoc-Chi-IP/Tech)
Cc: P. Andrew Fleming; John B. Haarlow
Subject: Specht v. Google

Herb,

We had a discovery teleconference on January 5, 2010 concerning electronic discovery, and we confirmed several points of discussion from that conference in an email to you dated January 12, 2010. We are still waiting for your responses to certain questions raised during that January 5 conference, including:

1. Whether you will accept service of a subpoena on behalf of Android, Inc. Founder Christopher White;
2. Whether or not you will provide us with Investigative Network's billing records;
3. Whether you have asked the Android, Inc. Founders: (a) if they know the location of the Android, Inc. servers or data; and/or (b) if they have any Android, Inc. ESI on personal (i.e. non-Google) computers; and
4. When you expect to begin producing ESI.

Please answer these questions no later than January 29. If we need to seek relief from the Court, in the interest of efficiency, we want to be able to file any motion in time to be heard on February 4.

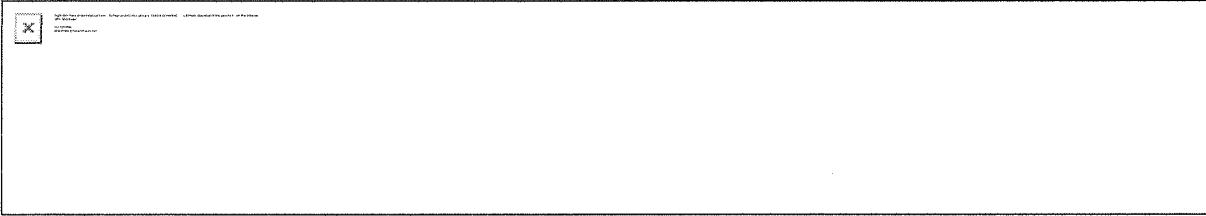
In your Responses to Plaintiffs' Second Set of Requests for Documents and Things to Google, you refuse to produce any documents responsive to Request Nos. 3-7 because you contend that such documents are not relevant. Plaintiffs maintain that the documents requested are relevant to, among other things, the question of whether the Founders are subject to personal jurisdiction in the Northern District of Illinois in this litigation. If you insist that we sue Android, Inc. and its founders before proceeding with this discovery, we are prepared to that – however, our impression is that all parties should prefer to address the personal jurisdiction question first, so as to avoid unnecessary motion practice. Please let us know no later than January 29 whether you will produce documents responsive to Request Nos. 3-7. If you have a compromise to propose, please let us know in advance of that date. We will make someone from our office available at your convenience to discuss any such proposal.

Also, in your Responses to Plaintiffs' Second Set of Requests for Documents and Things to Google you refuse to produce any documents responsive to Request No. 27, seeking market research and other documents related to Google's Android Platform because: (a) the Request is not limited to market research regarding use of the ANDROID trademark in commerce; and (b) the Request is vague because it uses the undefined terms "market research," "due diligence" and "benefit." We regard these objections as wholly unfounded. Please let us know no later than January 29 whether you will produce documents responsive to Request No. 27. Again, if you have a compromise to propose, please let us know as soon as possible, and we will make someone available to discuss this at your convenience.

This email does not purport to assert all of Plaintiffs' objections, rights and/or remedies concerning the many discovery issues that the parties are currently working through, all of which are expressly reserved.

Regards,

John



EXHIBIT

F

John B. Haarlow

From: John B. Haarlow
Sent: Monday, February 22, 2010 12:00 PM
To: 'FinnH@gtlaw.com'; John Shonkwiler
Cc: P. Andrew Fleming; martym@villageinvestments.com; DunningJ@gtlaw.com
Subject: RE: Specht/Google

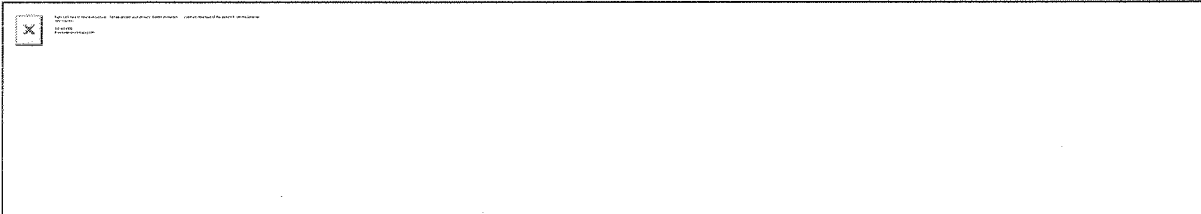
Herb - This message responds to your message below.

With respect to your third document request, to the extent we have not already produced responsive documents, we will produce additional responsive documents as part of our ongoing review and rolling production of Plaintiffs' ESI.

With regard to the subpoena to Mr. Murphy, we are willing to accept service on Mr. Murphy's behalf. Such service is effective as of today.

Regards,

John



From: FinnH@gtlaw.com [mailto:FinnH@gtlaw.com]
Sent: Sunday, February 21, 2010 11:08 PM
To: John Shonkwiler
Cc: P. Andrew Fleming; John B. Haarlow; martym@villageinvestments.com; DunningJ@gtlaw.com
Subject: Specht/Google

John,

This is in furtherance of Plaintiffs' Responses to Google's Third Set of Document Requests served on February 16th. In those Responses Plaintiffs state that they will produce responsive documents. Please advise when we may expect to receive those documents.

Also, we are still waiting for confirmation of your acceptance of service of the subpoena for Mr. Murphy, either by your firm or Mr. Murphy directly. Please advise whether service has been completed or whether the expense of formal service will be required from Plaintiffs and Mr. Murphy.

Herb Finn

Herbert H. Finn

Shareholder

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