

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BRIGHT RESPONSE, LLC,

Plaintiff,

vs.

Case No.: 2:07-cv-371

GOOGLE INC., *et al.*,

Defendants.

**AOL INC'S RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION TO
DEFENDANTS**

REQUEST FOR ADMISSION NO. 19:

Admit that You use one or more case-base knowledge engines to interpret electronic messages.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

AOL objects to this Request on the grounds that (i) it is vague and ambiguous, including with respect to the terms “use,” “interpret,” and “electronic messages;” (ii) seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; (iii) it is not reasonably limited in scope; (iv) seeks information that is not within AOL's possession, custody, or control, to the extent it seeks information about Defendants Google and Yahoo; (v) it calls for premature expert opinions; and (vi) is premature to the extent the Court has not yet construed the terms "case-base knowledge engines" and "electronic messages."

Subject to and without waiving the above General and Specific Objections, AOL responds as follows: AOL's search results returned in response to search queries at search.aol.com and AOL's Search Marketplace are implemented by Google, and AOL lacks sufficient information regarding Google's implementation of these search results or of AOL Search Marketplace to respond to this request. AOL denies any part of the remainder of the request.