

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

NORTHEASTERN UNIVERSITY and
JARG CORPORATION

Plaintiffs,

v.

GOOGLE INC.

Defendant.

Case No. 2:07-CV-486-CE

JURY TRIAL DEMANDED

**PLAINTIFFS NORTHEASTERN UNIVERSITY AND JARG CORPORATIONS'
PRE-TRIAL DISCLOSURES**

Pursuant to the Court's Discovery Order and Docket Control Order, dated August 21, 2008 (Dkts. 32 & 33), Plaintiffs Northeastern University and Jarg Corporation file and serve their Pre-Trial Disclosures subject to and without waiver of their motions in limine, motions to exclude certain evidence, *Daubert* motions and challenges to experts (if any), and any dispositive motions. Subject to the foregoing:

1. Plaintiffs submit the following preliminary identification of witnesses whom Plaintiffs may rely on for testimony at trial either live or by deposition.

Witness to Present Live	Will Call	May Call
Ken Baclawski	√	
Michael Belanger		√
Mel Bernstein		√
Bill Coughran		√
Sunil Dalavoy		√
Jeffrey Dean		√
Nadav Eiron		√
Urs Hölzle		√
John Jarosz	√	
Kaustuv		√
Arthur Keller	√	

Vin Lembo	✓	
David Martin		✓
Cos Nicolaou		✓
Anna Patterson		✓
David Roache		✓
Anthony Tomasic		✓
Shalom Wertsberger		✓
Yonatan Zunger		✓

Plaintiffs reserve the right to call any witness designated by Defendant Google Inc. and to call additional trial witnesses on rebuttal. Plaintiffs also reserve their right not to call one or more of the trial witnesses identified above, or to object on any grounds to the admissibility of the testimony of trial witnesses on Defendant's witness list and further reserves their right to move for the exclusion of such testimony.

Plaintiffs further reserve the right to amend or supplement this witness list.

2. Plaintiffs submit as Attachment A hereto their designations of those witnesses whose testimony Plaintiffs may present at trial by means of deposition.

3. Plaintiffs submit as Attachment B hereto their preliminary identification of those items Plaintiffs expect or may offer as exhibits at trial. Plaintiffs reserve the right to supplement this list with any late-served documents as may be appropriate. Plaintiffs also reserve the right to present demonstrative exhibits, which have not been designated herein.

Dated: February 18, 2011

Respectfully submitted,

/s/ Nicole E. Glauser

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 18th day of February, 2011.

/s/ Nicole E. Glauser

Nicole E. Glauser