

ATTACHMENT A:
DEFENDANT GOOGLE INC.'S REBUTTAL
DESIGNATIONS AND OBJECTIONS TO PLAINTIFFS'
DEPOSITION DESIGNATIONS

OBJECTION KEY TO DEPOSITION DESIGNATIONS

Abbreviation	Objection
106	F.R.E. 106
402	F.R.E. 402
403	F.R.E. 403
602	F.R.E. 602
701	F.R.E. 701
801	F.R.E. 801
802	F.R.E. 802
805	F.R.E. 805
A/C	Attorney Client Privilege and/or Work Product Immunity
AA	Asked and Answered
AF	Assumes Fact(s) not in evidence
AR	Argumentative
BER	Best Evidence Rule (F.R.E. 1002)
CQ	Compound Question
CS	Calls for Speculation
E	Expert testimony from a person who was not designated as an expert and who did not submit an expert report
F	Lacks Foundation
IA	Incomplete Answer
IQ	Incomplete Question
MC	Mischaracterizes witness's testimony
OS	Outside the Scope of Rule 30(b)(6) topics
V	Vague
WC	Waste of time/Cumulative evidence

BILL COUGHRAN (taken on February 4, 2011)

Plaintiffs Designations	Google Objections to Designations
10:16-25	106
17:16-18:11	106
19:18-20	106, MC, AR
20:2-3	106, MC, AR
20:6-21:3	402, 403
21:8-22:7	402, 403, MC, AR
22:12-14	V
23:10-15	106
24:12-15	106, V
24:19	106
25:14-22	106, V, MC, AA
26:24-27:7	106
28:9-29:22	106, 602, CS
30:23-31:22	602, CS
32:14-33:10	602, 801, 802, CS
33:15-24	106
34:3-5	V, AR
34:7-10	V, AR
34:12-15	V, AR, AA
34:17-21	106, V, AR, AA
35:7-13	V, AR, AA
35:15-18	V, AR, AA
36:3-7	602, CS
36:23-37:12	106
37:21-38:9	106
39:3-8	402, 403, 701, V, AF, CS
39:10-12	402, 403, 701, V, AF, CS
39:14-40:3	602, CS, BER, IA
40:23-25	V, CS, BER, IA
41:2	V, CS, BER, IA
44:21-25	106
47:16-25	402, 403
48:5-10	402, 403
48:25-49:2	402, 403
49:12-19	402, 403
50:19-23	106, 402, 403
51:11-17	402, 403
52:3-18	402, 403
54:13-56:7	106
60:9-61:7	106
61:12-15	V
64:17-65:8	106
69:18-70:16	402, 403, 601, 701, 802

Plaintiffs Designations	Google Objections to Designations
70:22-23	106, CS, V
84:16-85:9	106
86:18-21	106
86:25-89:2	402, 403, CS, V
89:7-15	402, 403
92:6-17	106
93:22-94:22	402, 403
95:1-96:19	602, CS
102:11-103:14	AA, AR, MC
105:16-107:11	106
117:14-19	A/C
119:7-18	A/C
120:2-6	A/C
121:20	106
121:22-122:1	A/C
122:6-11	A/C
123:2-125:24	402, 403, OS
126:20-127:8	402, 403, OS
128:4-129:14	106
131:3-133:4	602, CS
133:10-134:4	106
134:13-136:3	106, AR, AA
138:21-139:21	AR, AA
140:17-22	602, CS
140:25-141:11	A/C, 602, CS

Counter-Designations

11:1-9
 18:12-19
 19:2-5, 7-16
 23:5-9
 24:16-18
 25:5-13
 27:8-10
 29:23-30:1
 33:25-34:2
 34:25-35:4
 37:13-16
 38:10-13
 45:1-4
 51:5-10
 53:17-54:6
 56:17-57:8
 61:8-11
 65:9-17
 70:25-71:3

71:5-12
82:25-83:7
84:5-15
86:22-24
92:18-19
107:12-24
108:13-21
121:17-19
129:15-23
134:5-12
136:4-13

SUNIL DALUVOY (taken on December 7, 2010)

Plaintiffs Designations	Google Objections to Designations
16:11-15	106
17:6-18:19	106
19:8-11	106, 403, V
31:20-22	106, 402, 403
36:4-37:4	106
43:11-44:10	402, 403, V, MC
54:9-23	106
59:4-60:2	106, V, CS, IA
61:2-18	V
65:18-66:8	V
71:20-73:12	402, 403, V, MC, AR, AF
74:10-17	106, V
83:9-85:22	V, MC, AR, AF, F
86:4-19	106, 402, 403, 602
98:25-99:3	106, 402, 403, 602
101:21-102:16	402, 403, 602, V, MC
106:19-107:1	106
114:3-115:22	602, 701, CS, V, AR, E, OS
116:17-23	602, 701, CS, V, E, OS
117:5-118:18	602, 701, CS, V, E, AF, F, OS
130:12-20	V, AA, AF
131:22-132:6	402, 403, 602, CS, V, OS
132:13-16	402, 403, 602, CS, V, OS
132:20-133:1	402, 403, 602, CS, V, OS
141:5-23	602, CS, V, OS
147:12-19	602, CS, V, OS
152:1-11	106, 402, 403, 602, CQ, CS, V, OS

Plaintiffs Designations	Google Objections to Designations
159:2-160:6	402, 403, 602, CQ, CS, V, OS
163:23-164:8	402, 403, 602, CS, V, OS
164:22-167:19	402, 403, 602, CS, V, OS

Counter-Designations

16:16-17:1
 18:20-22
 19:12-23
 30:18-23
 35:7-36:3
 37:5-12
 38:10-39:4
 60:4-11
 66:10-24
 67:4-8
 67:10-68:13
 99:3-23
 107:2-4
 153:17-154:23
 161:5-11

DR. JEFFREY DEAN (taken on November 2, 2010)

Plaintiffs Designations	Google Objections to Designations
10:13-18	106
10:24-11:3	106
11:8-12	106
11:15-25	106
12:5-18	106
12:22-25	106
13:5-9	106
29:6-16	106
31:21-32:6	V, CQ
36:14-17	106
47:15-49:2	402, 403
51:1-13	106
60:15-61:4	OS
114:13-25	106
115:7-18	106
117:9-12	106
119:15-23	106, 402, 403, V, CQ, OS

Plaintiffs Designations	Google Objections to Designations
156:25-157:5	106
181:11-182:5	602, CS, OS
186:11-187:1	602, CS, OS
194:1-22	402, 403, 602, CS, V, OS

Counter-Designations

10:19-22
 11:4-6
 11:13
 12:1-3
 12:19-20
 13:1-3
 13:10
 24:7-9
 29:17-21
 36:18-20
 49:17-50:25
 114:4-12
 115:1-6
 115:19-24
 117:13-118:1
 118:17-19
 118:21-119:3
 157:6-18
 158:7-10

DR. NADAV EIRON (taken on May 12, 2010)

Plaintiffs Designations	Google Objections to Designations
25:17-26:15	106
28:2-12	602, CS, V
50:15-18	602, CS, V
64:22-66:7	106
74:4-9	106
79:20-22	106
91:4-17	106
105:18-106:2	106
114:11-13	106, IA
118:11-18	106
122:23-123:8	106, IA
130:14-18	106
133:25-134:9	106, IA
169:20-170:19	106

Plaintiffs Designations	Google Objections to Designations
171:1-9	106, IA
209:14-19	402, 403
213:3-18	V, CS, AF, F
214:17-215:12	V
217:21-24	602, V, AA, CS, OS
222:23-224:8	106, 402, 403, 602, CS
228:4-7	602, CS
228:9-11	602, CS
232:18-19	402, 403
242:4-11	106, IA
246:4-7	403, 701, E, OS
246:15-18	403, 701, E, OS
255:21-256:6	106
257:17-22	106, 403, 701, E, OS
260:15-261:16	403, 701, E, OS
273:19-20	106, IQ, IA
274:10-12	106, IA

Counter-Designations

26:16-20
 27:9-14
 66:8-67:4
 68:4-5
 73:17-74:3
 75:1-8
 79:1-7
 79:23-80:9
 105:10-17
 106:3-22
 114:14-18
 118:7-10
 123:9-12
 130:19-131:4
 134:10-18
 170:20-24
 171:10-14
 225:1-18
 242:12-25
 255:8-14
 257:23-24
 258:1-15
 273:3-18
 273:22-274:6
 274:13-17

DR. URS HOELZLE (taken on November 4, 2010)

Plaintiffs Designations	Google Objections to Designations
54:10-24	106, V
57:13-15	106, V
91:17-92:15	402, 403
104:18-105:24	106, V, IA
106:17-23	106
121:16-123:9	402, 403
128:15-24	602, CS
139:6-23	106, V
140:9-141:8	106, V
149:25-150:20	403, V
171:23-172:11	402, 403, OS, V
173:4-25	402, 403
174:16-176:2	402, 403, V
176:21-178:4	402, 403
181:8-182:10	402, 403
187:24-188:10	402, 403

Counter-Designations

33:23-36:14
36:16-37:17
51:4-53:13
105:15-24
106:3-16

KAUSTUV (taken on December 3, 2010)

Plaintiffs Designations	Google Objections to Designations
7:24-8:4	IQ
22:4-15	402, 403, V, CS
27:7-22	402, 403
31:4-32:10	602, V, CS, OS
36:25-38:2	106, IQ
49:11-16	602, V, CS, AF, F
58:5-8	602, V, CQ, CS, AF, F
76:24-77:15	402, 403, V, MC
77:17-78:1	402, 403, V, MC
89:3-92:24	106, IA
99:6-100:2	106
136:2-15	106, 602, CS, AF, F, OS, IQ, IA
136:21-139:8	602, CS, AA, AF, F, OS
142:8-16	602, CS, AA, AF, F, OS
152:11-25	106, AA, WC

Plaintiffs Designations	Google Objections to Designations
153:7-154:9	402, 403

Counter-Designations

7:21-23
38:3-6
92:25-93:3
100:3-14
136:16-19
153:1-6

DR. COSMOS NICOLAOU (taken on October 18, 2010)

Plaintiffs Designations	Google Objections to Designations
28:22-29:2	106
37:24-38:17	106
46:12-47:13	106, IQ
49:14-50:1	106
69:2-15	106, 801, 802
92:23-95:25	106, IA
105:18-24	402
106:3-10	402
107:15-108:1	402
108:20-109:9	402
116:12-117:17	106
119:20-120:5	106
130:11-131:2	106
131:8-15	106, 602, CS, F
136:1-25	602, CS, F
138:1-11	106, IA
138:17-139:9	106, IA
143:21-144:2	602, CS, F
171:9-12	402, 403, 602, CS, F
186:4-15	106, IA, IQ
193:21-195:25	106, IA, IQ
213:3-16	106, IA
223:5-19	106
224:10-225:16	602, CS, F
266:20-267:23	402, 403, 106, A
268:18-270:11	402, 403
271:15-17	402, 403
272:18-274:8	106, 402, 403, 602, CS, F
275:3-18	402, 403
276:5-19	402, 403
278:19-279:16	106
282:5-285:10	106

Plaintiffs Designations	Google Objections to Designations
286:2-16	402, 403, BER
287:25-288:6	402, 403, 602, 801, 802, CS, F
291:4-20	OS

Counter-Designations

28:14-16
 28:18-20
 46:5-11
 49:10-13
 69:16-25
 96:1-12
 106:11-18
 117:18-118:7
 129:6-20
 131:3-7
 131:16-19
 138:12-16
 186:16-19
 196:1-10
 213:17-20
 223:20-25
 268:6-20
 274:9-12

DR. ANNA PATTERSON (taken on October 13, 2010)

Plaintiffs Designations	Google Objections to Designations
32:13-15	402
32:20-22	402
36:23-37:2	V
37:5-10	402, 403, 602, CS, F, V
37:12-13	402, 403, 602, CS, F, V
37:15-16	402, 403, 602, CS, F, V
37:18-25	402, 403, 602, CS, F, V
38:11-12	106, 402, 403
39:14-16	402, 403, 602, CS, F
42:10-18	106, 403, 602, CS, F
45:17-46:10	402, 403
46:22-25	106
54:22-55:12	403, BER
57:4-14	106, 403, V
57:18-25	106, V
58:20-23	106
59:3-6	V

Plaintiffs Designations	Google Objections to Designations
59:20-60:3	V
62:16-24	106
69:3-11	106, 403, 602, BER, CS, F
69:16-70:5	403, 602, CS, F
70:15-18	403, V
70:20-24	106, 403, V
71:4-11	106, 403, V
71:22-72:5	402, 403, V
78:10-23	402, 403, CQ
79:6-19	106, 403, 602, CS
79:22	402, 403
79:25-80:2	106, 402, 403
80:13-14	106, 402, 403, CS, MC
80:17	106, 402, 403, CS, MC
80:19-20	106, 402, 403, CS, MC
93:9-11	106, 602, CS, F
94:9-15	602, BER, CS, F
98:20-99:2	402, 602, CS, F
99:19-100:16	602, CS
102:16-18	BER
102:22-23	V
102:25-103:1	V
103:3-11	V
103:16-104:18	V
108:7-15	106
113:13-14	106, 402, 403, BER
114:9-17	602, CS, V, F
114:23-115:3	V
115:13-15	106
122:6-18	602, CS, F
126:22-127:10	V
127:13-23	106, V
133:14-16	602, F, CS
137:12-138:2	106
152:8-153:2	402, 403, 602, CS, BER, F
153:6-21	402, 403
154:7-18	402, 403, BER
154:24-155:20	BER, CS, F, 602
159:13-160:4	402, 403, V, BER
160:18-161:16	V
161:18-24	V
162:1-6	V
162:8-9	V
162:17-165:4	106, 402, 403, 602, BER, CS, F, V
173:12-174:4	AA, BER, MC
175:14-22	V

Counter-Designations

38:8-10
42:19-22
46:16-21
55:22-56:22
57:15-17
57:18-20
58:2-18
62:25-63:5
69:12-15
70:25-71:2
71:12-21
93:11-15
93:20-21
108:13-18
113:15-16
113:18-22
115:10-12
128:8-9
137:2-10
137:24-138:5
167:4-168:2

DAVID ROACHE (May 25, 2010)

Plaintiffs Designations	Google Objections to Designations
82:20-84:18	106
276:5-24	602, 801, 802, 805, CS, F
277:7-279:8	106, 602, 801, 802, 805, CS, F
286:20-287:23	106
288:20-290:10	106

Counter-Designations

82:16-19
84:19-21
287:25-288:4
290:11-16
296:16-23
297:2-9
298:8-16

ANTHONY TOMASIC (taken on May 5, 2010)

Plaintiffs Designations	Google Objections to Designations
10:14-24	V
17:22-18:2	BER, V
19:23-20:3	BER, V
22:10-15	V
23:8-17	106
28:1-10	V
32:17-22	106
35:14-24	BER, V
41:24-42:7	106, BER, V
42:13-43:11	106, BER, V
45:24-46:13	106, BER, V
47:24-48:15	106, BER, V
49:23-50:4	106, AA, BER, MC
51:10-14	BER, V
51:23-52:16	BER, V
54:14-16	106, 402
55:15-24	BER, V
57:25-59:6	106
63:6-64:12	BER, V
64:25-65:3	106, BER
65:18-66:18	BER, V
71:15-23	106, V
75:3-11	106, V
76:25-77:20	V
79:7-17	106, V, BER
80:19-83:22	106, H, V
84:12-14	106, BER, V
86:9-16	V
92:13-93:14	BER
94:8-96:19	BER, V
101:10-104:10	106, BER
106:18-21	106, BER
107:4-108:8	BER
108:14-109:22	106, BER
113:14-20	BER
114:11-115:2	106, BER
121:10-122:9	BER
122:15-124:17	106, AA, BER
126:3-9	106, BER
126:16-127:14	106, BER
128:13-129:5	106, BER
131:9-24	106, BER
132:3-11	BER
137:5-17	106, BER
152:12-153:25	106, BER

Plaintiffs Designations	Google Objections to Designations
156:11-157:18	402, 403
157:23-158:11	402, 403
159:13-24	106, 402, 403

Counter-Designations

22:20-23:7
 31:9-32:16
 40:8-41:5
 45:8-23
 46:14-47:17
 54:13-54:13
 54:17-20
 57:8-24
 64:20-24
 71:7-14
 79:1-6
 84:8-19
 100:16-101:9
 105:17-106:17
 108:9-13
 113:21-114:10
 122:10-14
 125:4-126:2
 127:15-18
 128:7-12
 131:3-8
 137:18
 151:25-152:11
 159:25-160:1

SHALOM WERTSBERGER (taken on September 28, 2010)

Plaintiffs Designations	Google Objections to Designations
28:13-15	106
28:21-24	106
56:24-57:19	106
88:11-89:7	106, 402, 403, 602, CS, F

Counter-Designations

93:2-22
 93:25-94:3

DR. YONATAN ZUNGER (taken on August 20, 2009)

Plaintiffs Designations	Google Objections to Designations
9:9-12	IA, 106
21:18-22:9	106
29:10-12	106, IQ
42:7-43:9	106, IA
68:10-13	106
71:10-16	402
71:20-72:3	106, 602, CS, F
81:2-11	106
81:18-24	106, IA
94:4-11	106
114:10-11	106, IQ
117:24-118:7	106, IQ, IA
122:25-123:14	106
129:6-8	106, IA
140:20-141:1	106
152:17-153:1	602, CS, F
153:20-23	106, IQ, IA
162:22-163:4	106, IQ, IA
164:8-17	106, IA

Counter-Designations

21:14-17
29:8-9
43:10
68:14-24
71:17-19
81:12-20
81:25-82:8
95:11-14
115:5-21
114:7
117:17-23
118:11-17
123:15-19
124:5-9
129:9-19
141:2-7
162:17-21
164:18-19

**OBJECTIONS TO PLAINTIFFS'
INCOMPLETENESS DESIGNATIONS (D.I. 139-1)**

DR. KENNETH BACLAWSKI (taken on December 13, 2010)

Plaintiffs Incompleteness Designations	Google Objections to Designations
6:16-17	402, 403
9:25-11:3	402, 403
119:23-121:13	402, 403, 801, 802

DR. URS HOELZLE (taken on November 4, 2010)

Plaintiffs Incompleteness Designations	Google Objections to Designations
194:8-17	402, 403

DR. ANNA PATTERSON (taken on October 13, 2010)

Plaintiffs Incompleteness Designations	Google Objections to Designations
124:17-20	402, 403, AR, AF, F, MC, V
141:6-9	402, 403, AA, AR, MC, V

DAVID ROACHE (May 25, 2010)

Plaintiffs Incompleteness Designations	Google Objections to Designations
106:9-107:8	402, 403, 801, 802, CS, AF, F
122:4-123:13	402, 403, 602, 801, 802, CS
154:14-155:6	402, 403, 801, 802, CS, AF, F

KAUSTUV (taken on December 3, 2010)

Plaintiffs Incompleteness Designations	Google Objections to Designations
22:4-6, 22:8	402, 403, 801, 802, CS, AF, F
39:12-16	402, 403, 602

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