

**EXHIBIT B:
PLAINTIFFS' OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS**

LEGEND OF OBJECTIONS

- “A” - Lack of authenticity, FED. R. EVID. 901.
- “AT” - Improper attorney testimony/argument at deposition.
- “B” - Not the best evidence, FED. R. EVID. 1002-1004 & 1006.
- “C” - Cumulative, FED. R. EVID. 402 & 403.
- “D” - Subject to a filed/anticipated *Daubert* motion or motion to exclude.
- “Dup.” - Duplicative.
- “H” - Hearsay, FED. R. EVID. 801-803.
- “I” - Incomplete (*necessary additional testimony noted*), FED. R. EVID. 106.
- “IO” - Improper opinion testimony from lay witness, FED. R. EVID. 701 & 702.
- “III” - Illegible.
- “LF” - Lack of foundation or lack of personal knowledge, FED. R. EVID. 602.
- “LS” - Lack scientific reliability, FED. R. EVID. 702 & 703.
- “M” - Multiple documents.
- “ML” - Subject to a filed/anticipated Motion in Limine.
- “MSJ” - Subject to a filed/anticipated Motion for (Partial) Summary Judgment.
- “NI” - Not properly identified on Defendant’s trial exhibit list.
- “NR” - Not Relevant, FED. R. EVID. 402.
- “P” - Physical exhibit to which Plaintiffs reserve right to object following exchange of same in accordance with agreement among the parties.
- “Priv.” - Privileged/attorney work-product.
- “PV” - Probative value substantially outweighed by danger of unfair prejudice; confusion of issues; waste of time; considerations of undue delay; misleading nature of exhibit or testimony; needless presentation of cumulative evidence, FED. R. EVID. 402 & 403.
- “T” - Not timely produced.
- “408” - Offer of settlement/settlement negotiations, FED. R. EVID. 408.

**BILL COUGHRAN
(February 4, 2011)**

Google's Counter-Designation	Plaintiffs' Objection
11:1-9	I (11:14-17)
18:12-19	
19:2-5, 7-16	
23:5-9	
24:16-18	LF, NR, AT
25:5-13	
27:8-10	LF, NR, I (27:11-13)
29:23-30:1	LF, NR, I (30:13-18)
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	LF, NR, I (71:22-72:1, 72:4-6)
71:5-12	
82:25-83:7	
84:5-15	
86:22-24	
92:18-19	NR, I (92:20-21)
107:12-24	
108:13-21	
121:17-19	AT
129:15-23	NR
134:5-12	
136:4-13	

**SUNIL DALUVOY
(December 7, 2010)**

Google's Counter-Designation	Plaintiffs' Objection
16:16-17:1	NR, PV
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	NR, I (66:25-67:3)
67:4-8	NR
67:10-68:13	NR
99:3-23	NR
107:2-4	
153:17-154:23	
161:5-11	

**DR. JEFFREY DEAN
(November 2, 2010)**

Google's Counter-Designation	Plaintiffs' Objection
10:19-22	NR, PV, AT
11:4-6	NR, PV, AT
11:13	NR, PV, AT
12:1-3	NR, PV, AT
12:19-20	NR, PV, AT
13:1-3	NR, PV, AT
13:10	NR, PV, AT
24:7-9	
29:17-21	
36:18-20	
49:17-50:25	LF, PV
114:4-12	
115:1-6	
115:19-24	NR, LF, PV
117:13-118:1	
118:17-19	LF, PV
118:21-119:3	LF, PV
157:6-18	
158:7-10	

DR. NADAV EIRON
(May 12, 2010)

Google's Counter-Designation	Plaintiffs' Objection
26:16-20	
27:9-14	
66:8-67:4	NR, PV
68:4-5	
73:17-74:3	
75:1-8	LF, PV, NR, I (75:9-23)
79:1-7	
79:23-80:9	
105:10-17	NR
106:3-22	NR
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	LF, PV, NR
242:12-25	H, NR, LF, PV
255:8-14	IO, ML, NR, PV
257:23-24	
258:1-15	PV, NR, IO, JL
273:3-18	
273:22-274:6	
274:13-17	NR

DR. URS HOELZLE
(November 4, 2010)

Google's Counter-Designation	Plaintiffs' Objection
33:23-36:14	LF, PV, NR, H
36:16-37:17	LF, PV, NR, H
51:4-53:13	LF, PV, NR, H
105:15-24	
106:3-16	LF, PV, NR

**KAUSTUV
(December 3, 2010)**

Google's Counter-Designation	Plaintiffs' Objection
7:21-23	
38:3-6	
92:25-93:3	
100:3-14	
136:16-19	NR, PV, AT
153:1-6	

DR. COSMOS NICOLAOU
(October 18, 2010)

Google's Counter-Designation	Plaintiffs' Objection
28:14-16	
28:18-20	
46:5-11	
49:10-13	LF, NR, I
69:16-25	LF, NR, I (70:1-6)
96:1-12	
106:11-18	
117:18-118:7	
129:6-20	NR, I
131:3-7	
131:16-19	
138:12-16	
186:16-19	
196:1-10	
213:17-20	
223:20-25	I (224:1-5)
268:6-20	
274:9-12	

DR. ANNA PATTERSON
(October 13, 2010)

Google's Counter-Designations	Plaintiffs' Objection
38:8-10	
42:19-22	LF, PV, NR
46:16-21	NR
55:22-56:22	LF, PV, NR
57:15-17	
57:18-20	
58:2-18	LF, PV, NR
62:25-63:5	LF, NR, PV
69:12-15	
70:25-71:2	LF, PV
71:12-21	LF, PV, NR
93:11-15	NR
93:20-21	NR
108:13-18	
113:15-16	
113:18-22	
115:10-12	
128:8-9	H, LF, PV, NR, I
137:2-10	
137:24-138:5	137:24-2 = no obj. 138:3-5 = NR, PV, I
167:4-168:2	LF, PV, NR

DAVID ROACHE
(May 25, 2010)

Google's Counter-Designation	Plaintiffs' Objection
82:16-19	NR
84:19-21	
287:25-288:4	
290:11-16	LF, I (290:17-22)
296:16-23	
297:2-9	
298:8-16	

ANTHONY TOMASIC
(May 5, 2010)

Google's Counter-Designation	Plaintiffs' Objection
22:20-23:7	
31:9-32:16	
40:8-41:5	NR, LF, PV, IO, D
45:8-23	LF, PV
46:14-47:17	IO, NR
54:13-54:13	I (53:25-54:12), NR
54:17-20	I (54:14-16), NR
57:8-24	
64:20-24	
71:7-14	NR
79:1-6	
84:8-19	NR, LF, PV
100:16-101:9	
105:17-106:17	
108:9-13	NR
113:21-114:10	
122:10-14	NR
125:4-126:2	LF, PV
127:15-18	LF, PV
128:7-12	LF, PV
131:3-8	LF, PV
137:18	
151:25-152:11	D
159:25-160:1	

SHALOM WERTSBERGER
(September 28, 2010)

Google's Counter-Designation	Plaintiffs' Objection
93:2-22	NR, PV
93:25-94:3	NR, PV

DR. YONATAN ZUNGER
(August 20, 2009)

Google's Counter-Designation	Plaintiffs' Objection
21:14-17	
29:8-9	
43:10	
68:14-24	LF, PV, NR
71:17-19	
81:12-20	
81:25-82:8	
95:11-14	
115:5-21114:7	ML, LF, PV, IO
117:17-23	
118:11-17	I (118:6-7), NR
123:15-19	
124:5-9	NR, LF, PV, IO
129:9-19	
141:2-7	
162:17-21	
164:18-19	