

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

NORTHEASTERN UNIVERSITY and
JARG CORPORATION

Plaintiffs,

v.

GOOGLE, INC.

Defendant.

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

DEMAND FOR JURY TRIAL

**NORTHEASTERN UNIVERSITY AND JARG CORPORATION'S
INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Northeastern University and Jarg Corporation (collectively, "Plaintiffs") make the following disclosures based upon information presently available to Plaintiffs. Plaintiffs reserve the right to supplement, revise, correct, or otherwise amend this Initial Disclosure, to assert additional claims and theories that they later develops, and/or to produce additional information during the course of discovery, as provided by the Federal Rules of Civil Procedure, and to rely on such information as evidence in this action. By making these disclosures, Plaintiffs do not waive any applicable privilege, work product protection, or other objection, and reserve the right to object to the production or admissibility of any information included in the categories below.

A. The following persons are likely to have discoverable information that Plaintiffs may use to support its claims

Based upon Plaintiffs' investigation thus far, Plaintiffs presently believe the following individuals and businesses are likely to have discoverable information that Plaintiffs may use to support their claims, unless solely for the purposes of impeachment. Plaintiffs believe that other, currently unknown, individuals may have discoverable information and specifically reserve the

right to identify additional witnesses as discovery proceeds.

By indicating the general subject matter of information these individuals may possess, Plaintiffs do not make any concession, agreement, admission, or waiver of any ultimate determination of relevance or admissibility of particular information for any purpose, nor do Plaintiffs waive attorney-client privilege or work-product immunity or any other privilege or immunity. Plaintiffs are in no way limiting their right to call any individuals or businesses listed to testify concerning other subjects.

All current and former Northeastern and Jarg employees should be contacted through Plaintiffs' attorneys of record.

<u>Name</u>	<u>Contact Information</u>	<u>Subject(s)</u>
Ken Baclawski	Contact through Plaintiffs' counsel	Has knowledge of the subject matter of the patent in suit. Has knowledge of the conception and reduction to practice of the invention.
Michael Belanger	Contact through Plaintiffs' counsel	Has knowledge of the licensing of the patent in suit.
Anthony N. Pirri	Contact through Plaintiffs' counsel	Has knowledge of the licensing of the patent in suit.
Luiz Andre Barroso	Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Knowledge of the accused systems
Jeffrey Dean	Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Knowledge of the accused systems
Urs Hölzle	Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Knowledge of the accused systems

B. The following is a description, by category and location, of documents, electronically stored information and tangible things not already produced that are in the possession, custody or control of Plaintiffs and that Plaintiffs may use to support their claims or defenses.

Plaintiffs provide the following listing without concession, agreement, admission, or waiver of any ultimate determination of relevance or admissibility of particular information for any purpose, and without waiver of attorney-client privilege or work-product immunity or any other privilege or immunity. Plaintiffs also reserve the right to identify additional documents, electronically stored information, and tangible things throughout discovery.

<u>General Description</u>	<u>Location</u>
Additional documents relating to the licensing of the patent in suit and commercialization efforts	Jarg Corp. 330 Bear Hill Road Waltham MA, 02541

C. The following is a computation and description, by category, of damages claimed by Plaintiffs.

Plaintiffs intend to seek damages adequate to compensate for infringement of their patent by the defendant. Those damages are in no event less than a reasonable royalty together with interest and costs as fixed by the Court. The total damages and costs are unknown at the present time.

D. The following is a description of any insurance agreement under which a person carrying on an insurance business may be liable to satisfy part of or all of a judgment.

Plaintiffs are unaware of any insurance agreements under which a person engaging in an insurance business may be liable either to satisfy all or part of a judgment or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: October 10, 2008

Respectfully submitted,

/s/ Michael Valek

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ATTORNEYS FOR NORTHEASTERN
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing this document was served on all counsel of record on October 10, 2008 in the manner indicated below.

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/s/ Michael Valek