

EXHIBIT 1

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

SOFTWARE RIGHTS ARCHIVE, LLC	§	
	§	
V.	§	CIVIL NO. 2:07-CV-511(TJW-CE)
	§	
GOOGLE, INC., ET AL.	§	

**PLAINTIFF'S FIRST SET OF REQUESTS
FOR ADMISSION AND INTERROGATORIES**

TO: Google, Inc. by and through its attorneys of record, Juanita R. Brooks, Jason W. Wolff, Fish & Richardson, 12390 El Camino Real, San Diego, California 92130, Thomas B. Walsh, IV, Fish & Richardson P.C., 5000 Bank One Center, 1717 Main Street, Dallas, Texas 75201, Harry L. Gillam, Jr., Melissa R. Smith, Gillam & Smith, L.L.P., 303 South Washington Avenue, Marshall, Texas 75670.

Yahoo! Inc., by and through its attorneys of record, Michael A. Jacobs, Rachel Krevans, Richard S.J. Hung, Morrison & Foerster LLP, 425 Market Street, San Francisco, California 94105, and Michael E. Jones, John F. Bufe, Potter Minton, A Professional Corporation, 110 N. College, Suite 500, P. O. Box 359, Tyler, Texas 75710.

IAC Search & Media, Inc., by and through its attorneys of record, Claude M. Stern, Jennifer A. Kash, Antonio R. Sistos, Alison E. Monahan, Quinn Emanuel Urquhart Oliver & Hedges, LLP, 555 Twin Dolphin Drive, Suite 560, Redwood, CA 94065, Mark D. Baker, Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Avenue, 22nd Floor, New York, NY 10010, Otis Carroll, Collin Maloney, Ireland, Carroll & Kelley, P.C., 6101 S. Broadway, Suite 500, Tyler, Texas 75703.

AOL LLC, by and through its attorneys of record Juanita R. Brooks, Jason W. Wolff, Fish & Richardson, 12390 El Camino Real, San Diego, California 92130, Thomas B. Walsh, IV, Fish & Richardson P.C., 5000 Bank One Center, 1717 Main Street, Dallas, Texas 75201, Harry L. Gillam, Jr., Melissa R. Smith, Gillam & Smith, L.L.P., 303 South Washington Avenue, Marshall, Texas 75670, Gerald Ivey, Finnegan Henderson Farabow Garrett & Dunner, LLP, 901 New York Ave., NW, Washington, DC 20001, Robert L. Burns, Darren M. Jiron, James G. Bell, Finnegan Henderson Farabow Garrett & Dunner, LLP, Two Freedom Square, 11955 Freedom Dr., Reston, VA 20190.

Lycos, Inc., by and through its attorneys of record, Claude M. Stern, Jennifer A. Kash, Antonio R. Sistos, Quinn Emanuel Urquhart Oliver & Hedges, LLP, 555 Twin Dolphin Drive, Suite 560, Redwood, CA 94065, Mark D. Baker, Quinn Emanuel Urquhart Oliver & Hedges, LLP, 51 Madison Avenue, 22nd Floor, New York, NY 10010, Otis Carroll, Collin Maloney, Ireland, Carroll & Kelley, P.C., 6101 S. Broadway, Suite 500, Tyler, Texas 75703.

Pursuant to Rules 33 and 36 of the Federal Rules of Civil Procedure, Plaintiff Software Rights Archive, LLC serves this First Set of Requests for Admission and Interrogatories on Defendants Google, Inc., Yahoo! Inc., IAC Search & Media, Inc., AOL LLC, and Lycos, Inc.

Each Defendant is required to respond to these Requests for Admissions and Interrogatories separately from the other Defendants at the offices of Plaintiff's counsel, Smyser Kaplan & Veselka, L.L.P. within thirty days of service of these discovery requests.

Respectfully submitted,



Lee L. Kaplan

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all counsel of record pursuant to Federal Rules of Civil Procedure on this the 11th day of August, 2008.



Lee L. Kaplan

INTERROGATORY NO. 8:

Describe in detail all of the bases for Your contention, if any, that You have not and do not infringe, whether direct, indirect, contributory, or inducement and or whether literal or under the doctrine of equivalents the '352, '494 or '571 Patents as well as any documents and facts supporting that contention.

INTERROGATORY NO. 9:

Please describe in detail, including a flowchart, of each computer step or operation made in implementing any Search Engine Technology. There should be sufficient detail to determine the presence or non-presence of each claim limitation of any claim of the '352, '494 or '571 patents.

INTERROGATORY NO. 10:

Describe in detail all of the bases for each and every one of Defendant's contentions, if any, that '352, '494, or '571 Patent, are unenforceable or invalid.

INTERROGATORY NO. 11:

Describe in detail all of the bases for each and every one of Defendant's contentions, if any, that Plaintiff's claims are barred in whole or in part by estoppel or laches.

INTERROGATORY NO. 12:

Identify each and every person or entity for which You have manufactured, used, sold, offered to sell, licensed, or offered to license Your products or services relating to Search Engine Technology, including but not limited to, the date the product or service was offered for sale, the date the product or service was sold, the amount of revenue from the sale, and the amount of revenue anticipated from an offer to sell whether or not it became a sale.

INTERROGATORY NO. 13:

Identify all inventors, creators, substantial contributors, or persons involved in the creation or development of Your products or services relating to Search Engine Technology as well as any other witness with knowledge of relevant facts.