

EXHIBIT 2

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

SOFTWARE RIGHTS ARCHIVE, LLC

v.

**GOOGLE INC., YAHOO! INC., IAC
SEARCH & MEDIA, INC., AOL LLC,
AND LYCOS, INC.**

Civil Case No. 2:07-cv-511 (TJW)

**DEFENDANT GOOGLE INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S
FIRST SET OF REQUESTS FOR ADMISSION (NOS. 1-12) AND
INTERROGATORIES (NOS. 1-13)**

For its objections and responses to Plaintiff Software Rights Archive, LLC's ("SRA") First Set of Requests for Admission and Interrogatories, Plaintiff Google Inc. ("Google") states as follows:

GENERAL OBJECTIONS

The following objections apply to each and every Request for Admission ("Request") and Interrogatory propounded by SRA. Google's responses are made without prejudice to any position as to admissibility at trial.

1. Google objects to the entirety of SRA's discovery requests on the grounds that SRA lacks standing to bring the current litigation against Google.
2. Google objects to each Definition, Instruction, Request, and Interrogatory to the extent that it imposes requirements that are inconsistent with or exceed those specified by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Eastern District of Texas, and/or the Rules of Practice for Patent Cases before the Eastern District of Texas.

time, Google identifies the documents marked with Bates numbers GLE0002601-GLE0003877. Discovery in this case has just commenced and Google's investigation is on-going. Therefore, Google reserves the right to modify or supplement its responses as more information is discovered.

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.

RESPONSE TO INTERROGATORY No. 8:

Google objects to this interrogatory as premature until SRA serves infringement contentions in this case, and the Court issues a claim construction. A requirement that a party provide contentions of this sort early in the litigation is in tension with the established time frames for declaring claim construction positions provided by the Patent Rules. *See Jacobs Chuck Mfg. Co. v. Shandong Weida Mach.*, No. 2:05-cv-185 (E.D. Tex. Aug. 18, 2006) (order denying motion to compel response to contention interrogatory). Google also objects to this interrogatory to the extent that it seeks information, documents, or things protected by the attorney-client privilege, the attorney work-product doctrine, and/or other applicable privileges or immunities. Google further objects to this interrogatory as overly broad and unduly burdensome, including because it requires Google to analyze products and/or services which may or may not be accused of infringement in this lawsuit, and to speculate as to the alleged manner in which they infringe the patents-in-suit. Google additionally objects to this interrogatory as compound and constituting at least three interrogatories by asking questions about three different patents with many different claims.

Dated: October 10, 2008

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ Thomas B. Walsh, IV

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served to all counsel of record, as follows, on this 10th day of October 2008 via U.S. Mail and electronic mail.

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