

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SOFTWARE RIGHTS ARCHIVE, LLC,
Plaintiff,

v.

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

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Case No. 2:07-CV-511 (CE)

Pending in:

United States District Court, Eastern District
of Texas, Marshall Division

**ALDO NOTO'S OBJECTIONS TO DEFENDANT'S
SUBPOENA TO PRODUCE DOCUMENTS**

To: Google Inc. and AOL LLC, by and through their attorneys of record Juanita R. Brooks, Fish & Richardson P.C., 12390 El Camino Real, San Diego, California 92130; Thomas B. Walsh, IV, Fish & Richardson P.C., 1717 Main Street, Suite 5000, Dallas, Texas 75201; Ramon K. Tabtiang, Stephen A. Marshall, Fish & Richardson P.C. 225 Franklin Street, Boston, Massachusetts 02110-2804; Harry L. Gillam, Jr., Melissa R. Smith, Gillam & Smith, L.L.P., 303 South Washington Ave., Marshall, Texas 75670.

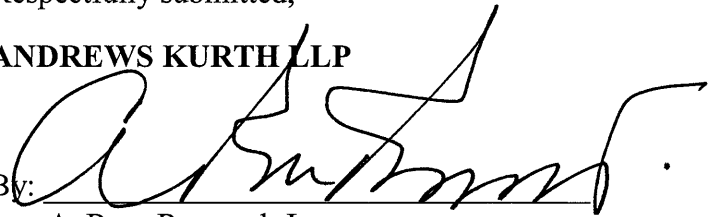
Pursuant to Fed. R. Civ. P. 45, non-party Aldo Noto submits the following objections to Defendant's Subpoena to Produce Documents Parts I and II (the "Subpoena").

Dated: November 3, 2008

Respectfully submitted,

ANDREWS KURTH LLP

By:

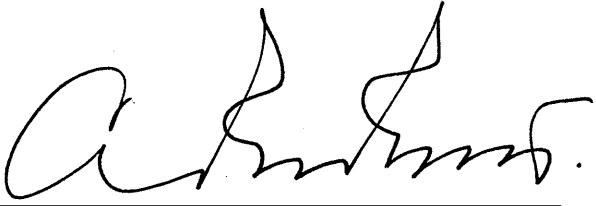


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ATTORNEYS FOR ALDO NOTO

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 3rd day of November, 2008.

By: 
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**OBJECTIONS TO REQUESTS FOR PRODUCTION
OF DOCUMENTS**

1. Aldo Noto objects to the Subpoena to the extent that it calls for the production of documents and/or information that is protected by the attorney-client privilege, the attorney work-product doctrine, other applicable privileges or immunities.
2. Aldo Noto objects to the Subpoena to the extent that it is overbroad, burdensome, and oppressive because it seeks documents not reasonably calculated to lead to the discovery of admissible evidence, because the burden of producing the requested documents far outweighs the benefit of its production, and because it imposes an unreasonable expenditure of time, effort, and money on a non-party.
3. Aldo Noto objects to the Subpoena to the extent that it calls for the production of confidential documents and/or information. Aldo Noto will produce such documents and/or information, if at all, subject to appropriate designation under any applicable protective orders.
4. Aldo Noto objects to the Subpoena to the extent that it contains requests that are vague and ambiguous. Aldo Noto will respond to such requests based on what he considers to be a reasonable interpretation of the meaning of each request.

Subject to, and without waiving, these objections, Aldo Noto will produce non-privileged, non-objectionable responsive documents at a mutually agreed-upon date and location.