

**DEFINITIONS & INSTRUCTIONS**

1. "YOU", "YOUR" or "YOURS" refers to Google, Inc. ("GOOGLE"), including without limitation all of its corporate locations and all predecessors, subsidiaries, parents & affiliates and all past or present directors, officers, partners, associates, employees, staff members, agents, representatives, consultants, attorneys, and entities acting in joint-venture, affiliate, partnership or business relationship with GOOGLE and other acting on behalf of GOOGLE.
2. The term "DOCUMENT" is used herein in this broadest sense under the Federal Rules of Civil Procedure and applicable case law and includes all tangible things, all originals (or, if originals are not available, identical copies thereof), archives, all non-identical copies of all documents, all drafts of final documents, all other written, printed, or recorded matter of any kind and all other data compilations from which information can be obtained that are or have been in your actual or constructive possession or control, regardless of the medium on which they are produced, reproduced or stored (including with limitation computer programs and files containing any requested information), and any recording or writing as these terms are defined in Rule 1001 of the Federal Rules of Evidence. Any document bearing marks, including without limitation initials, stamped initials, comments, or notations not part of the original text or photographic reproduction thereof is a separate document.
3. The terms "REFER" or "RELATE" or any variant thereof include, but are not limited to, the following meanings: pertaining to, analyzing, assessing, compromising, concerning, containing, constituting, discussing establishing, mentioning, containing, evidencing, describing, displaying, showing, identifying, including, recording, reflecting, stating,



proving, disproving, consisting of, supporting, contradicting, in any way legally, logically, or factually connected with the matters referenced, or having tendency to prove or disapprove any matter referenced.

4. The term "COMMUNICATION" or any variant thereof means any contact between or among two or more persons and shall include, without limitation, written contact by means such as letters, memoranda, telegrams, telecopies, telexes, e-mail or any other document; and any writings memorializing any oral contact such as face to face meetings or telephone conversations.
  
5. The term "THE BLOGS" shall mean the internet message boards and blog sites found at [www.trolltracker.blogspot.com](http://www.trolltracker.blogspot.com) (a/k/a the "TrollTracker") and [www.patentlyo.com](http://www.patentlyo.com) (a/k/a "Patently O)."

**DOCUMENTS REQUESTED**

1. All DOCUMENTS REFRRING or RELATING to COMMUNICATIONS to or from (1) RICHARD FRENKEL a/k/a "The TrollTracker," (2) DENNIS CROUCH, individually and *sub. nom.* "Patently O," (3) MALLUN YEN, (4) JOHN NOH, (5) Mark Chandler, (6) CISCO SYSTEMS, INC. or (7) THE BLOGS regarding (1) ERIC M. ALBRITTON; (2) the filing of Civil Action No. 5:07-CV-00156, styled *ESN, LLC v. Cisco Systems, Inc.*, in the United States District Court for the Eastern District of Texas; or (3) the October 16-17, 2007 postings on [www.trolltracker.blogspot.com](http://www.trolltracker.blogspot.com).
2. All DOCUMENTS REFRRING or RELATING to COMMUNICATIONS with or responses posted to THE BLOGS regarding (1) ERIC M. ALBRITTON; (2) the filing of Civil Action No. 5:07-CV-00156, styled *ESN, LLC v. Cisco Systems, Inc.*, in the United States District Court for the Eastern District of Texas; or (3) the October 16-17, 2007 postings on [www.trolltracker.blogspot.com](http://www.trolltracker.blogspot.com).
3. All DOCUMENTS REFRRING or RELATING to user searches of the internet and/or THE BLOGS regarding (1) ERIC M. ALBRITTON; (2) the filing of Civil Action No. 5:07-CV-00156, styled *ESN, LLC v. Cisco Systems, Inc.*, in the United States District Court for the Eastern District of Texas; or (3) the October 16-17, 2007 postings on the [www.trolltracker.blogspot.com](http://www.trolltracker.blogspot.com) including documents reflecting the number of such searches conducted between October 16, 2007 and March 1, 2008.
4. All DOCUMENTS REFRRING or RELATING to the establishment, creation, maintenance and financial support for THE BLOGS.