

EXHIBIT H

**DEFENDANTS’ OBJECTIONS TO BEDROCK’S DESIGNATION OF
THE DEPOSITIONS OF NON-GOOGLE DEFENDANTS**

Google objects to the designation of testimony from other defendants, including Yahoo! Inc., Amazon.com Inc., SoftLayer Technologies, Inc., MySpace Inc., Match.com, LLC and AOL Inc. as irrelevant under Federal Rule of Evidence 402 and 403, unfairly prejudicial, confusing, and a waste of time. As of March 17, 2011, Bedrock and Match.com have executed a settlement agreement with a provision that Match.com will be dismissed from the litigation. In the event that Bedrock still intends to use deposition designations from Match.com employees during its trial against Google, Google reserves the right to submit objections and counterdesignations to those designations.

**DEFENDANTS’ OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF NEENA BUDHIRAJA ON JANUARY 5, 2011**

Google generally objects to the designation of any of Ms. Budhiraja’s testimony based on Federal Rule of Evidence 402 and 403 as irrelevant and unfairly prejudicial because Bedrock’s damages expert does not rely on any of the revenue information in his report, and on the ground that this revenue information offered by Bedrock fails to satisfy the standard for relevance or admissibility under the Federal Circuit’s recent decision in *Uniloc USA Inc. v. Microsoft Corp.*, No. 03-CV-0440 (Fed. Cir. Jan. 4, 2011). Google further objects generally because this testimony is subject to the Court’s ruling on a pending motion *in limine*. In addition to these general objections, Google further objects as indicated below:

Bedrock’s Designations	Defendants’ Objections	Bedrock’s Responses to Defendants’ Objections	Defendants’ Rebuttal Designations	Bedrock’s Objections to Defendants’ Rebuttal Designations
6:9 - 6:10				
6:13 - 6:14	402			
6:17 - 6:20				

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
14:6 - 14:23	402			
17:12 - 17:23	104a, 402, MIL, 30b6		16:25 - 17:7	
24:4 - 25:1	104a, 402, V, DI, MIL, 30b6		25:2 - 25:13	
36:17 - 36:24	104a, 402, MIL, 30b6			
39:15 - 39:24	104a, 402, MIL, 30b6			
46:14 - 46:17	402, MIL			
46:20 - 47:5	402, MIL, 30b6, 104a			
47:7 - 47:7	402, MIL, 30b6, 104a			
47:9 - 47:12	402, MIL, 30b6, 104a			
47:14 - 47:14	402, MIL, 30b6, 104a			
47:16 - 48:1	402, MIL, 30b6, 104a			
48:5 - 48:7	402, MIL, 30b6, 104a			
59:22 - 59:25	403, MIL, 104a, 402, 30b6			
60:2 - 60:2	403, MIL, 104a, 402, 30b6			
60:4 - 60:8	403, MIL, 104a, 402, 30b6			
68:8 - 68:13	104a, 402, MIL			
68:15 - 68:16	104a, 402, MIL			
68:18 - 68:20	104a, 402, MIL			
68:22 - 68:25	104a, 402, MIL			
69:2 - 69:5	104a, 402, MIL, 30b6			
69:24 - 70:3	104a, 402, AA, 30b6, MIL			
70:5 - 70:7	104a, 402, AA, 30b6, MIL			
73:24 - 74:8	104a, 402, AA, MIL			
74:13 - 74:16	104a, 402, AA,			

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
	MIL			
74:18 - 74:18	104a, 402, AA, MIL			
77:5 - 77:7	104a, 402, DI, V, 30b6, MIL			
77:9 - 77:9	104a, 402, DI, V, 30b6, MIL			

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF LAURENT CHAVEY ON JANUARY 7, 2011**

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
5:10 - 5:13				
5:17 - 5:24				
6:2 - 6:9	402			
9:22 - 11:13	402, 403, 501			
13:2 - 14:8	V, DI		14:9 - 14:14	
17:19 - 18:23	104a, 402, 403, 501, 702			
23:19 - 23:21	V, 103, 104a,			
23:23 - 23:23			23:25 - 24:13	
27:15 - 27:16	V, 103			
27:18 - 27:20	V, 103			
27:24 - 28:3				
28:5 - 28:9				
28:11 - 29:11				
30:3 - 30:8				
31:17 - 31:18	V			
31:20 - 32:2	V			
32:4 - 32:22			32:23 - 34:8	
37:12 - 38:3				
39:9 - 39:10	V			
39:13 - 39:15	V			
42:5 - 42:7			42:17 - 42:20	
43:20 - 44:12				
44:23 - 44:25	V			
45:2 - 45:2				
45:7 - 45:10	V, 103			
45:12 - 45:14	V, 103			
45:16 - 45:19	V			
45:22 - 46:5	V			
47:9 - 48:4			48:5 - 48:18	
52:13 - 52:13	V		49:11 - 49:14	
52:15 - 52:18			50:14 - 52:12	
52:23 - 53:2			53:15 - 54:2	
53:10 - 53:14			56:7 - 56:16	
58:8 - 58:17			57:3 - 58:7	
65:12 - 65:23	MT		58:18 - 58:20	
65:25 - 66:1	MT		59:20 - 60:24	

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
68:21 - 68:25	V, 30b6		61:11 - 61:22	
69:2 - 69:3	V, 30b6		68:8 - 68:20	
69:5 - 69:7	V, 30b6			
74:14 - 75:23	402, 403, AA, 30b6, 702			
76:3 - 76:12	402, 403			
81:25 - 82:2				
99:7 - 99:9			94:25 - 96:4	
99:21 - 100:2			96:14 - 96:18	
101:20 - 101:23			96:21 - 99:3	
104:1 - 104:11			100:3 - 100:5	
127:22 - 129:23			101:4 - 101:16	
129:25 - 129:25			101:24 - 102:2	
130:2 - 130:8			102:4 - 102:5	
134:9 - 135:4			102:8 - 102:16	
135:12 - 136:1			103:1 - 103:13	
			104:12 - 106:24	
			113:11 - 113:16	
			114:10 - 114: 12	
			123:24 - 127:5	
			134:5 - 134:8	
			136:2 - 136:5	
			137:11 137:13	

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF JOSEPH D'AVANZO ON DECEMBER 7, 2011**

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
138:2 - 138:23	AA		84:12 - 84:22	
139:21 - 141:13	AA, 104a, 402		88:16 - 90:1	
141:15 - 142:4	104a, 402, 611c			
154:17 - 154:25	701			
155:2 - 155:10	402			
156:10 - 156:13	104a, 402, 602, 701			
156:15 - 156:16	104a, 402, 602, 701			
156:18 - 156:22	104a, 402, 602, 701			
156:24 - 156:24	104a, 402, 602, 701			
157:14 - 157:17	402			
157:19 - 157:20	402			
157:22 - 157:25	402			

**DEFENDANTS’ OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF SUNIL DALUVOY ON JANUARY 14, 2011**

Google generally objects to the designation of any of Mr. Daluvoy testimony based on Federal Rule of Evidence 402 and 403 as irrelevant and unfairly prejudicial because Bedrock’s damages expert does not rely on any of the revenue information in his report and on the ground that this licensing information offered by Bedrock is irrelevant under the Federal Circuit’s decision in *ResQNet.com, Inc. v. Lansa, Inc.*, 594 F.3d 860 (Fed. Cir. 2010). Google further objects generally because this testimony is subject to the Court’s ruling on a pending motion *in limine*. In addition to these general objections, Google further objects as indicated below:

Bedrock’s Designations	Defendants’ Objections	Bedrock’s Responses to Defendants’ Objections	Defendants’ Rebuttal Designations	Bedrock’s Objections to Defendants’ Rebuttal Designations
5:6 - 5:8	402			
5:13 - 5:20			5:21 - 6:2	
23:18 - 24:10	104a, 30b6, 402			
24:17 - 24:18	V, 104a, 30b6, 402			
24:20 - 25:2	V, 104a, 30b6, 402			
25:19 - 25:21	104a, 30b6, 402			
25:23 - 25:24	104a, 30b6, 402		26:5 - 26:23	
33:14 - 33:19			30:18 - 31:19	
34:4 - 34:9				
34:11 - 34:11			41:17 - 41:19	
34:13 - 34:15			41:21 - 42:5	
43:9 - 43:11	104a, 501, 30b6, 402, V, 602		42:12 - 42:21	
43:16 - 43:17	104a, 501, 30b6, 402, V, 602		42:23 - 43:3	

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF ALEXEY KUZNETSOV ON JANUARY 27, 2011**

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
75:2 - 76:5	AA, 402, 403		64:7 - 64:23	
76:7 - 77:15	AA, 402, 403		73:22 - 74: 3	
78:2 - 78:7				
78:19 - 78:22	402, 403			
78:25 - 79:3	A, 403, CC, 104a			
79:5 - 79:8	A, 403, CC, 104a			
79:10 - 79:13	A, 403, CC, 104a			
79:16 - 80:22	A, 403, CC, 104a			
80:24 - 81:15			81:16 - 82:19	
86:10 - 86:21	402, 403, 104a		86:24 - 86:25	
94:21 - 95:1	401, 402, 104a		87:2 - 87:8	
95:3 - 95:5	401, 402, AA		87:10 - 87:13	
95:7 - 95:10	401, 402, AA		87:15 - 88:3	
95:18 - 95:21			95:22 - 97:20	
98:8 - 98:14	A, AA, 403, 701, MIL			
98:16 - 98:24	A, AA, 403, 701, 802, MIL, CD			
99:1 - 99:1	CD			
100:9 - 100:18	A, 403			
100:20 - 101:10	A, 403			
101:22 - 102:2	403, 701, 802, DI		102:3	
102:9 - 102:11	403, 701, 104a, MIL, V		102:5 - 102:7	
102:13 - 102:13	403, 701, 104a, MIL		102:14 - 102:16	
104:5 - 104:8	802, 104a, 701, 602, MIL, DI, V		102:18 - 102:20	
104:10 - 104:10	802, 104a, 701, 602, MIL, DI, V		104:11	
107:1 - 107:2	AA, 402, 403,		104:13 - 105:5	

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
	701, 802, DI			
107:4 - 107:4	AA, 402, 403, 701, 802, DI		107:6	
108:1 - 108:2	402, 403		108:19 - 108:20	
108:4 - 108:14	402, 403		108:24- 109:4	
108:16 - 108:18	402, 403		109:12 - 109:3	
109:5 - 109:6	402, 403		109:15 - 109:20	
109:8 - 109:11	402, 403		111:19 - 112:18	
110:18 - 111:9	402, 403		114:13 - 114:17	
			115:5 - 115:9	
			115:11 - 115:13	
			115:15 - 115:18	
			115:23 - 115:25	
			116:7 - 116:9	

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF DAMIAN MENSCHER ON JANUARY 14, 2011**

Google generally objects to the designation of any of Mr. Menscher's testimony based on Federal Rule of Evidence 802 as hearsay to the extent he testifies at trial. In addition to these general objections, Google further objects as indicated below:

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
5:6 - 6:1				
7:18 - 8:8	402, 403			
9:8 - 9:13	402			
10:4 - 10:9	402, 403, 501			
10:14 - 10:19	402, 403, 501			
11:4 - 11:12	AA, 402, 403, 501			
11:21 - 11:25	402			
12:20 - 12:22	402, 403, 501			
13:3 - 13:4	402, 403, 501			
25:1 - 25:5	30b6, 103, 104a, 402			
25:7 - 25:9	30b6, 103, 104a, 402			
26:11 - 26:12	30b6, 104a			
26:14 - 26:15	30b6, 104a			
26:17 - 26:18	30b6, 104a			
26:20 - 26:22	30b6, 104a			
26:24 - 26:25	30b6, 104a			
27:2 - 27:3	30b6, 104a			
27:5 - 27:7	V, CD, 30b6, 104a			
27:9 - 27:13	V, CD, 30b6, 104a			
27:15 - 27:19	103, 30b6, 104a			
27:21 - 27:22	30b6, 104a			
27:25 - 28:4	30b6, 104a			
28:6 - 28:7	V, 30b6, 103			
28:9 - 28:12	V, 30b6, 103			
28:14 - 28:18	V, 30b6, 103			
28:23 - 29:5	V, 30b6, 103			

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
29:7 - 29:9	30b6, 103, 104a			
29:10 - 29:16	30b6, 103, 104a			
30:10 - 30:11	V, 30b6, 104a			
30:13 - 30:14	V, 30b6, 104a			
30:16 - 30:18	V, 30b6, 104a		30:18	
31:13 - 31:14	V			
31:16 - 31:18				
31:20 - 32:1				
32:24 - 35:11			35:19	
44:21 - 44:24	V, C		35:21	
46:22 - 47:12	103, 602		35:23 - 36:20	
47:14 - 47:16	602		36:22 - 36:25	
47:18 - 47:20	602		37:2 - 37:4	
47:22 - 47:22	602		37:9 - 37:18	
58:3 - 58:12			42:10	
58:14 - 58:15			42:12 - 42:13	
58:17 - 58:24			47:24 - 48:9	
59:1 - 59:1			48:11	
59:4 - 59:13			48:13 - 49:1	
59:16 - 59:18			49:16 - 49:17	
59:20 - 59:21			49:21 - 50:3	
59:23 - 60:1			50:9 - 50:24	
61:10 - 61:10	103, 104a, 403, 602, 30b6, 402		52:19 - 54:19	
61:12 - 61:13	103, 104a, 403, 602, 30b6, 402		55:19 - 56:9	
61:15 - 62:24	103, 104a, 403, 602, 30b6, 402		56:18 - 58:2	
64:25 - 65:2	402		60:2 - 61:5	
66:19 - 67:11			63:15 - 63:16	
67:17 - 68:13			63:19 - 63:20	
69:15 - 70:3			74:14 - 75:23	
73:12 - 73:13	30b6, 602, 104a			
73:15 - 73:16	30b6, 602, 104a			
73:18 - 73:21				
73:23 - 73:25				

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF TRISHA WEIR ON JANUARY 13, 2011**

Google generally objects to the designation of any of Ms. Weir's testimony based on Federal Rule of Evidence 802 as hearsay to the extent she testifies at trial. In addition to these general objections, Google further objects as indicated below:

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
5:7 - 5:9				
5:19 - 5:23				
6:18 - 7:6			7:8 - 7:11	
11:11 - 12:1			8:11 - 11:10	
17:17 - 17:18	30b6, 602, 103		12:2 - 12:15	
17:22 - 17:25	30b6, 602, 103		13:3 - 13:11	
18:4 - 18:10	30b6, 602, 103		13:25 - 14:14	
20:19 - 20:22	103, 104a		18:12 - 19:3	
27:15 - 27:17			26:22 - 27:14	
32:12 - 34:18	103, 30b6		27:18 - 29:2	
47:12 - 47:14	CD		29:4 - 24:17	
47:16 - 47:18	CD		30:21 - 32:4	
48:11 - 48:13			46:23 - 47:11	
51:9 - 52:7			47:20 - 48:4	
54:15 - 54:16	104a, 103		48:6 - 48:9	
54:18 - 54:18	104a, 103		48:14 - 48:20	
56:13 - 56:23	V, 30b6, MIL, 402, 403		53:15 - 54:14	
57:17 - 57:19	104a, 402, 403, MIL		55:2 - 55:9	
57:22 - 57:23	104a, 402, 403, MIL		55:20 - 55:22	
62:23 - 63:13	30b6, 402, 403, MIL, 104a		55:24 - 56:11	
65:2 - 65:3			56:24 57:2	
65:5 - 65:6	AA, 30b6, 602		57:13 - 57:16	
66:20 - 66:24	30b6, 602, 402, 403		58:11 58:20	
73:8 - 73:11	402, 104a, 30b6		64:20 - 64:24	
73:18 - 73:24	V, 402, 104a, 30b6		66:5 - 66:7	

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
74:20 - 75:9	602, 402, 104a, 30b6		66:9 - 66:16	
83:4 - 83:7	30b6, 103		72:25 - 73:2	
84:24 - 85:4	30b6, 602		73:4 - 73:6	
85:6 - 85:6	30b6, 602		73:12 - 73:13	
85:18 - 85:20			73:15 - 73:16	
85:23 - 85:23			73:25 - 74:3	
94:3 - 94:22	30b6, 104a, 103		74:13 - 74:19	
95:10 - 95:11	30b6, 602, MIL		83:10 - 83:19	
95:13 - 95:16	30b6, 602, MIL		87:19 - 89:4	
98:12 - 98:21			90:11 - 91:2	
			97:21 - 98:11	

**DEFENDANTS' OBJECTIONS AND REBUTTAL DESIGNATIONS OF
DEPOSITION OF MIKHAIL LOTVIN ON JUNE 4, 2010**

Bedrock's Designations	Defendants' Objections	Bedrock's Responses to Defendants' Objections	Defendants' Rebuttal Designations	Bedrock's Objections to Defendants' Rebuttal Designations
			244:16 - 244:17	
			244:19	
			244:21 - 245:2	
			245:6 - 245:17	
			245:19 - 245:25	