

Exhibit R

**CONTAINS CONFIDENTIAL MATERIAL – OUTSIDE COUNSEL EYES ONLY
PURSUANT TO LOCAL PATENT RULE 2-2**

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

EOLAS TECHNOLOGIES, INC.,

Plaintiff,

v.

ADOBE SYSTEMS, INC., et. al.,

Defendants.

Civil Action No. 6:09-cv-446-LED

JURY TRIAL DEMANDED

**DEFENDANT THE GO DADDY GROUP’S OBJECTIONS AND RESPONSES TO
EOLAS TECHNOLOGIES, INC.’S FIRST SET OF INTERROGATORIES [NOS. 1-5]**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, The Go Daddy Group, Inc. (“Go Daddy”) objects and responds to Plaintiff Eolas Technologies, Inc.’s (“Eolas”) First Set of Interrogatories (Nos. 1–5) (“Interrogatories”) as follows. Go Daddy’s objections and responses are made according to the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of Texas and are made to the best of Go Daddy’s present knowledge, information and belief. Discovery in this case continues, and Go Daddy’s investigation is ongoing based upon information presently available to Go Daddy. Accordingly, Go Daddy reserves the right to supplement or amend these responses as discovery in this matter progresses, should future discovery or investigation indicate that supplementation or amendment is necessary. Go Daddy also reserves the right to produce or use any documents produced and/or discovered after service of these responses in support of, or in opposition to, any motion, in depositions, or at trial. These objections and answers are without prejudice to Go Daddy’s right to use or rely on subsequently discovered information.

GENERAL OBJECTIONS

1. Go Daddy incorporates by reference each and every General Objection set forth

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surveys, reports, tracking data, estimates, statistics, metrics, analytics, web analytics, profitability studies, business plans and the like” (emphasis added). The quoted list includes documents of disparate types, and Go Daddy has no duty to speculate about what other kinds of documents Eolas is referring to with the language “and the like.” This language thus renders the interrogatory vague, ambiguous, overbroad and unduly burdensome.

Subject to, and without waiving, the foregoing general and specific objections, and pursuant to Federal Rule of Civil Procedure 33(d), Go Daddy is producing documents bearing Bates numbers GD-EOLAS017943 – GD-EOLAS027192 in response to Interrogatory No. 1.

INTERROGATORY NO. 2:

Separately for each Accused Product, identify the worldwide geographic location(s) (*e.g.* city, state and country) of all of Your servers, or servers of which You are aware, which host, provide access to, or make available, or which have hosted, provided access to, or made available, each Accused Product and identify the web server technology (*e.g.* Apache, etc.) which underlies or powers each server identified and identify the person(s) most knowledgeable and the documents related to Your response to this Interrogatory. This Interrogatory is limited to October 2004 to the present time.

RESPONSE TO INTERROGATORY NO. 2:

Go Daddy incorporates its General Objections as if fully set forth herein. Go Daddy also objects to this Interrogatory to the extent it incorporates Eolas’s definition of “Accused Products,” which Go Daddy objects to as vague, ambiguous, overbroad, and unduly burdensome as set forth in the General Objections. Go Daddy further objects that this is a compound Interrogatory having several sub-parts that should each be counted as an individual Interrogatory. Go Daddy also objects to providing information regarding the “worldwide” geographic locations of its servers, on the ground that information regarding servers and services outside the United States is neither relevant to this action nor reasonably calculated to lead to the discovery of admissible evidence, and the request is overbroad and unduly burdensome. Go Daddy further

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objects to this interrogatory on the ground that it seeks information that Go Daddy has already provided to Eolas by its declaration of Barry Strzala dated May 13, 2010.

Subject to, and without waiving, the foregoing general and specific objections, Go Daddy responds as follows: The websites www.godaddy.com, videos.godaddy.com, and radiogodaddy.com (“Accused Go Daddy Websites”) are all presently hosted on servers that (1) are physically located at 1301 W. University Drive, Mesa, Arizona 85201 and (2) that run Microsoft Internet Information Services (IIS) web server software, Microsoft .NET framework code interpreters, and Microsoft Windows operating systems. Certain other content related to the Accused Go Daddy Websites, including image, video, and javascript files, may also be hosted on one or more servers hosted by Akamai. To the best of Go Daddy’s knowledge, Akamai has servers located worldwide. The person most knowledgeable regarding the Accused Go Daddy Websites is Neal Wood.

INTERROGATORY NO. 3:

Separately for each Accused Product, identify the number and percentage of users, customers, or others of whom You are aware, who access, and/or make use of the Accused Products utilizing the following browser technologies:

- a. Microsoft Internet Explorer (including mobile versions)
- b. Apple Safari for Windows
- c. Apple Safari for Apple operating systems
- d. Apple Safari for the Apple iPhone or iPod
- e. Browsers for BlackBerry (including the BlackBerry browser)
- f. Google Chrome for Windows
- g. Google Chrome for Apple operating systems
- h. Google Android

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Dated July 9, 2010

/s/ Neil J. McNabney

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**ATTORNEYS FOR DEFENDANT
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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 on July 9, 2010 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ J. Nicholas Bunch

J. Nicholas Bunch