

Exhibit A

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

EOLAS TECHNOLOGIES	§	
INCORPORATED	§	
	§	
PLAINTIFF,	§	
	§	
v.	§	
	§	
ADOBE SYSTEMS INC.,	§	CIVIL ACTION NO. 6:09-CV-446
AMAZON.COM, INC., APPLE INC.,	§	
ARGOSY PUBLISHING, INC.,	§	JURY TRIAL DEMANDED
BLOCKBUSTER INC., CDW CORP.,	§	
CITIGROUP INC., EBAY INC., FRITO-	§	
LAY, INC., THE GO DADDY GROUP,	§	
INC., GOOGLE INC., J.C. PENNEY	§	
COMPANY, INC., JPMORGAN CHASE	§	
& CO., NEW FRONTIER MEDIA, INC.,	§	
OFFICE DEPOT, INC., PEROT	§	
SYSTEMS CORP., PLAYBOY	§	
ENTERPRISES INTERNATIONAL, INC.,	§	
RENT-A-CENTER, INC., STAPLES,	§	
INC., SUN MICROSYSTEMS INC.,	§	
TEXAS INSTRUMENTS INC., YAHOO!	§	
INC., and YOUTUBE, LLC	§	
	§	
	§	
DEFENDANTS.	§	

DEFENDANTS GOOGLE INC. AND YOUTUBE LLC’S TRIAL WITNESS LIST

Pursuant to the Court’s Discovery Order and Rule 26(a)(3) of the Federal Rules of Civil Procedure, Defendants Google Inc. and YouTube LLC (“together, “Google”) submit the following lists of witnesses whom Google expects to present at trial, may call if the need arises, or expects to present by deposition testimony. Google hereby incorporates by reference the witness lists of the other defendants in this case. Google also reserves the right to call any Google, Eolas or third party witness who may be deposed in this case. Google reserves the right to call as witnesses any

individuals found on Plaintiff Eolas Technologies Inc.’s (“Eolas”) witness list, or the witness list of any of the other defendants in this lawsuit, and reserves the right to call additional rebuttal witnesses.

Google further identifies any persons identified in Eolas’ initial disclosures, interrogatory responses, and expert reports not identified below.

Google reserves the right so supplement, augment, or otherwise modify this list based on circumstances as they may evolve before commencement of trial. At this time, Google identifies the following witnesses for trial:

	Witness	Expect to Present at Trial	May Call if Need Arises	Expect to Present by Deposition
1.	Valerie Blechar Can be contacted through counsel for Google		X	
2.	Albert Bodenhamer Can be contacted through counsel for Google		X	
3.	John Boyd Can be contacted through counsel for Google		X	
4.	Bill Brougher Can be contacted through counsel for Google		X	
5.	Keith Coleman Can be contacted through counsel for Google	X		
6.	Benigne Deprey Can be contacted through counsel for Google		X	
7.	Jonathan Effrat Can be contacted through counsel for Google		X	
8.	Brian Fitzpatrick Can be contacted through counsel for Google		X	
9.	Shankar Ganesh Can be contacted through counsel for Google		X	

10.	Matthew Gray Can be contacted through counsel for Google		X	X
11.	Kevin Gough Can be contacted through counsel for Google		X	
12.	Chris Harrelson Can be contacted through counsel for Google		X	
13.	Kaustuv Can be contacted through counsel for Google		X	
14.	Job Lawrence Can be contacted through counsel for Google		X	
15.	Benjamin Lewis Can be contacted through counsel for Google		X	
16.	Mark Martel Can be contacted through counsel for Google	X		
17.	Shishir Mehrotra Can be contacted through counsel for Google		X	
18.	Jason Miller Can be contacted through counsel for Google	X		
19.	Sundar Pichai Can be contacted through counsel for Google		X	
20.	Carlos Pizano Can be contacted through counsel for Google		X	
21.	Brian Rakowski Can be contacted through counsel for Google		X	
22.	Bart Sears Can be contacted through counsel for Google		X	
23.	Prasad Setty Can be contacted through counsel for Google		X	
24.	Leor Stern Can be contacted through counsel for Google		X	
25.	Gideon Wald Can be contacted through counsel for Google		X	

26.	Hunter Walk Can be contacted through counsel for Google	X		
27.	Joel Webber Can be contacted through counsel for Google		X	
28.	Peter Alexander Can be contacted through counsel for Google	X		
29.	M. Ray Perryman Can be contacted through counsel for Google	X		
30.	Dan Sadowski Can be contacted through counsel for Google	X		
31.	Richard Phillips Can be contacted through counsel for Google	X		
32.	Nick Godici Can be contacted through counsel for Google	X		
33.	Tim Berners-Lee		X	X
34.	Chris McRae		X	X
36.	Tony Johnson		X	
37.	David Thomson		X	
38.	George Toye		X	
39.	Bill Janssen		X	X
40.	Eric Bina	X		
41.	Pei-Yuan Wei	X		
42.	David Raggett		X	X
43.	Dale Dougherty		X	
44.	Scott Silvey	X		
45.	Marc Andreessen		X	
46.	Karl Jacob			X
47.	Kurt Pires		X	

48.	Apple Inc.		X	
49.	Microsoft Corp.		X	
50.	Regents of the University of California		X	
51.	Mozilla Foundation		X	
52.	Charles Krueger			X
53.	Charles Kulas			X
54.	Cheong Ang			X
55.	James Stetson			X
56.	Mark Swords		X	
57.	Michael D. Doyle		X	
58.	David C. Martin		X	
59.	Alicia Gackle		X	
60.	Brandy Hernandez		X	

Dated: August 12, 2011

/s/ Brandon H. Stroy

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*ATTORNEYS FOR DEFENDANTS
GOOGLE INC. & YOUTUBE LLC*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3), on this 12th day of August, 2011.

/s/ Brandon H. Stroy
Brandon H. Stroy