

EXHIBIT 19

STAPLESLINK.COM AND EWAY.COM DAMAGES DISCOVERY REQUEST

- Separately for stapleslink.com and eway.com, the date upon which each accused product/feature was first made available to online customers.
- For the period beginning with Staples' first use of an accused product/feature on stapleslink.com through the present: Monthly or quarterly U.S. revenue generated from the sale of products over stapleslink.com.
- For the period beginning with Staples' first use of an accused product/feature on stapleslink.com through the present: on a monthly or quarterly basis, the number of products sold in the U.S. over stapleslink.com.
- For the period beginning with Staples' first use of an accused product/feature on stapleslink.com through the present: on a monthly or quarterly basis, costs Staples incurred through the sale of products in the U.S. over stapleslink.com.
- For the period beginning with Staples' first use of an accused product/feature on eway.com through the present: monthly or quarterly U.S. revenue generated from the sale of products over eway.com.
- For the period beginning with Staples' first use of an accused product/feature on eway.com through the present: on a monthly or quarterly basis, the number of products sold in the U.S. over eway.com.
- For the period beginning with Staples' first use of an accused product/feature on eway.com through the present: on a monthly or quarterly basis, the costs Staples incurred through the sale of products in the U.S. over eway.com.

• Documents and other data sufficient to show the direct incremental revenue and costs associated with the implementation and use of accused products/features by U.S. stapleslink.com customers.

• Documents and other data sufficient to show the extent to which Staples has implemented accused products/features on stapleslink.com.

• Documents and other data sufficient to show the direct incremental revenue and costs associated with the implementation and use of accused products/features by U.S. eway.com customers.

• Documents and other data sufficient to show the extent to which Staples has implemented accused products/features on eway.com.

• For the period beginning with Staples' first use of an accused product on stapleslink.com through the present: the number and percentage of users, customers, or other visitors that accessed stapleslink.com utilizing the following Internet browsers:

Deleted: • Presentations, memoranda, correspondence, or other internal documents pertaining to Staples' use, or its anticipated use of the accused products/features on stapleslink.com.

Deleted: • Presentations, memorandums, correspondence, or other internal documents pertaining to Staples' use, or its anticipated use of the accused products/features on eway.com.¶

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- Microsoft Internet Explorer;
- Apple Safari;
- Google Chrome;
- Mozilla;
- Firefox;
- Any other Internet Browser not identified.

• For the period beginning with Staples' first use of an accused product on eway.com through the present: the number and percentage of users, customers, or other visitors that accessed eway.com utilizing the following Internet browsers:

- Microsoft Internet Explorer;
- Apple Safari;
- Google Chrome;
- Mozilla;
- Firefox;
- Any other Internet Browser not identified.