

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ROSETTA STONE LTD.

Plaintiff,

v.

GOOGLE INC.

Defendant.

CIVIL ACTION NO. 1:09cv736
(GBL / TCB)

**GOOGLE INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S PRE-TRIAL DISCLOSURES**

Defendant Google Inc. ("Google") makes the following responses and objections to Plaintiff's pre-trial disclosures served on April 2, 2010.

I. OBJECTIONS AND COUNTER-DESIGNATIONS TO ROSETTA STONE'S DEPOSITION DESIGNATIONS

Pursuant to Rule 32 of the Federal Rules of Civil Procedure, Google hereby makes the following objections and counter-designations to Plaintiff Rosetta Stone Ltd.'s ("Rosetta Stone") Designation of Deposition Testimony. Google reserves the right to amend, supplement, or withdraw its objections and counter-designations.

Google hereby objects as follows to the admission into evidence of the following deposition testimony designated by Plaintiff. Google objects generally to the introduction of any deposition testimony without a showing by Plaintiff that the witness whose testimony they seek to introduce is unavailable as required by Federal Rule of Evidence 804 and Federal Rule of Civil Procedure 32.

Google also hereby submits its counter-designations, which Google requests be read with Plaintiff's designations for completeness purposes if Plaintiff's designated testimony is admitted into evidence. Accordingly, Google submits these counter-designations conditionally and

reserves the right not to introduce any and all counter-designations. If Plaintiff's designations are not admitted, Google intends to withdraw the counter-designations listed below.

Google reserves the right to amend or supplement these counter-designations for any reason, including without limitation in response to Plaintiff's disclosure of trial witnesses, trial exhibits, deposition designations or other required disclosures. Furthermore, Google reserves its right to object, or to not object, to the entry into evidence of any deposition exhibit on any basis, notwithstanding any objection or counter-designation below relating to that exhibit.

Because the admissibility of testimony from a witness depends on the context, the inclusion of testimony from a witness on Google's own list of designations is not a waiver and should not be construed as a waiver of the right to object to the testimony or the use of the testimony when offered by Plaintiff. In addition, Google reserves the right to use at trial any testimony on Plaintiff's designations.

For those objections which are identified by an abbreviated code, the code corresponds to an objection as set forth below:

CODE	OBJECTION
A	Argumentative
AA	Asked and answered
B	Beyond scope of counter-designation
C	Cumulative
CC	Calls for conclusion
CD	Compound
DI	Designation incomplete; incomprehensible
DSI	Document speaks for itself
IH	Incomplete hypothetical
MT	Misstates prior testimony (mischaracterization)
NR	Non-responsive
O	Overbroad
V	Vague and ambiguous
30b6	Outside of the scope of FRCP 30b6 deposition topics for which witness was designated
103	Assumes facts not in evidence
104a	Lacks foundation

CODE	OBJECTION
402	Relevance
403	Unduly prejudicial
602	Calls for speculation; speculative
611c	Leading
701	Improper opinion by lay witness
702	Improper opinion by expert
802	Hearsay
901	Authenticity

Google hereby submits its objections and counter-designations to Rosetta Stone's deposition designations as follows:

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Aguiar, Christina	3/09/2010	15:8-15:16	V	
Aguiar, Christina	3/09/2010	15:20-15:25	AA	
Aguiar, Christina	3/09/2010	19:9-19:14	V, AA	
Aguiar, Christina	3/09/2010	20:14-21:13	V, CD, AA	
Aguiar, Christina	3/09/2010	21:25-22:7	V, AA	
Aguiar, Christina	3/09/2010	23:12-24:25	V, O	
Aguiar, Christina	3/09/2010	25:9-25:18	104a, V	
Aguiar, Christina	3/09/2010	28:9-30:6	V, 30b6	
Aguiar, Christina	3/9/2010	34:16-34:22	104a, 602, CD	
Aguiar, Christina	3/9/2010	34:23-35:18	MT, AA, V	
Aguiar, Christina	3/9/2010	35:11-35:15	V	
Aguiar, Christina	3/9/2010	35:19-35:25	104a, 602	
Aguiar, Christina	3/9/2010	36:13-38:9	104a, 602	
Aguiar, Christina	3/9/2010	39:5-35:9	DI, 104a, 602	
Aguiar, Christina	3/9/2010	50:12-51:24	104a, 602	
Aguiar, Christina	3/9/2010	103:11-103:15	402, AA	
Aguiar, Christina	3/9/2010	111:21-112:12	104a, 802, 901	
Aguiar, Christina	3/9/2010	123:10-123:15	402, 403	
Aguiar, Christina	3/9/2010	123:16-123:19	AA	
Aguiar, Christina	3/9/2010	124:21-125:13	602, V, IH	
Aguiar, Christina	3/9/2010	126:15-129:10	V, O	

¹ Google objects to all designations by Plaintiff that include attorney objections and colloquy.

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Aguiar, Christina	3/9/2010	140:4-140:10	104a, CD	
Aguiar, Christina	3/9/2010	148:15-149:8	104a, 602, A, V	
Aguiar, Christina	3/9/2010	180:14-180:25	602, AA	
Aguiar, Christina	3/9/2010			103:4-103:10; 52:20-53:17; 112:13-114:21; 122:13-123:8; 147:18-148:14
Alferness, Jonathan	3/12/2010	14:9-18	104a, V	
Alferness, Jonathan	3/12/2010	46:2-8	30b6, 402, 602	
Alferness, Jonathan	3/12/2010	46:12-25	30b6, 402, 602, 104a	
Alferness, Jonathan	3/12/2010	47:1-4	30b6, 104a, 402	
Alferness, Jonathan	3/12/2010	47:7-16	30b6, 104a, 402, 403	
Alferness, Jonathan	3/12/2010	48:19-49:5	30b6, 104a, 602, 402	
Alferness, Jonathan	3/12/2010	58:2-17	104a, V, 402	
Alferness, Jonathan	3/12/2010	70:12-71:4	V	
Alferness, Jonathan	3/12/2010	71:17-72:1	402, 104a	
Alferness, Jonathan	3/12/2010	72:18-25	402, 104a	
Alferness, Jonathan	3/12/2010	73:1-15	402, 104a, 901, 602	
Alferness, Jonathan	3/12/2010	75:18-22	AA, 104a	
Alferness, Jonathan	3/12/2010	75:23-76:6	V, 30b6	
Alferness, Jonathan	3/12/2010	76:8-15	V	
Alferness, Jonathan	3/12/2010	76:17-24	V	
Alferness, Jonathan	3/12/2010	76:25-78:6	V, 30b6	
Alferness, Jonathan	3/12/2010			78:8-79:25; 13:7-14:7; 8:18-21; 9:20-23; 11:18-12:4; 12:7-15
Chen, Terri	2/23/2010	23:17-21	DI	
Chen, Terri	2/23/2010	25:10-25:17	CD	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Chen, Terri	2/23/2010	33:14-33:24	402	
Chen, Terri	2/23/2010	37:11-38:7	402, 403, 103, 602	
Chen, Terri	2/23/2010	85:16-86:2	104a, C	
Chen, Terri	2/23/2010	93:2-93:12	104a, 103, C	
Chen, Terri	2/23/2010	117:21-118:14	104a	
Chen, Terri	2/23/2010	153:19-153:23	104a, V	
Chen, Terri	2/23/2010	154:22-155:3	MT	
Chen, Terri	2/23/2010	155:4-155:12	104a, 602	
Chen, Terri	2/23/2010	155:13-156:6	AA, 602	
Chen, Terri	2/23/2010	171:13-172:1	103, 104a, 30b6	
Chen, Terri	2/23/2010	172:2-172:6	104a, AA, 30b6, 103	
Chen, Terri	2/23/2010	172:7-172:11	103, 104a, 30b6	
Chen, Terri	2/23/2010	181:21-182:5	104a, 30b6	
Chen, Terri	2/23/2010	182:6-11	104a	
Chen, Terri	2/23/2010	187:24-189:21	104a, 901, 30b6, 802	
Chen, Terri	2/23/2010	189:22-191:5	901, 30b6, 802, 104a	
Chen, Terri	2/23/2010	192:23-193:17	104a, 30b6	
Chen, Terri	2/23/2010	194:1-195:15	901, 602, 104a, 402, 30b6, V	
Chen, Terri	2/23/2010	196:11-197:11	104a, 30b6, 602	
Chen, Terri	2/23/2010	198:18-199:6	30b6, 104a, 602	
Chen, Terri	2/23/2010	208:17-209:3	104a, 30b6, V, CC	
Chen, Terri	2/23/2010	209:4-209:10	AA	
Chen, Terri	2/23/2010			24:1-11; 23:6-16; 23:22-23
Chiang, Edward	2/24/2010	13:1-13:4	V	
Chiang, Edward	2/24/2010	13:8-13:14	V	
Chiang, Edward	2/24/2010	14:10-14:16	V	
Chiang, Edward	2/24/2010	18:7-18:17	104a, V, O	
Chiang, Edward	2/24/2010	19:8-19:16	104a	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Chiang, Edward	2/24/2010	19:18-19:24	104a	
Chiang, Edward	2/24/2010	21:25-22:11	V, O	
Chiang, Edward	2/24/2010	22:16-22:19	104a, 602	
Chiang, Edward	2/24/2010	54:19-55:5	104a, 402, 802, 901	
Chiang, Edward	2/24/2010	55:17-56:23	104a, 402, 802, 901	
Chiang, Edward	2/24/2010	62:6-62:25	104a, 402, 802, 901	
Chiang, Edward	2/24/2010	63:14-63:20	104a, 402, 802, 901	
Chiang, Edward	2/24/2010	64:1-64:8	104a, 402, 802, 902	
Chiang, Edward	2/24/2010	65:10-65:22	104a, 402, 802, 901	
Chiang, Edward	2/24/2010	69:18-70:7	104a, 802, 901	
Chiang, Edward	2/24/2010	70:23-73:12	104a, 802, 901	
Chiang, Edward	2/24/2010	78:5-78:21	104a, 802, 901	
Chiang, Edward	2/24/2010			79:10-81:2; 67:1-67:8; 18:18-19:6; 20:2-20:25
Datta, Sanjay	3/11/2010	16:15-16:22	104a, V	
Datta, Sanjay	3/11/2010	27:12-27:19	V	
Datta, Sanjay	3/11/2010	27:21-28:2	602, 30b6	
Datta, Sanjay	3/11/2010	34:14-34:20	104a	
Datta, Sanjay	3/11/2010	35:14-35:17	602	
Datta, Sanjay	3/11/2010	35:18-35:22	602	
Datta, Sanjay	3/11/2010	36:12-36:21	O, V	
Datta, Sanjay	3/11/2010	39:19-39:22	V, 104a	
Datta, Sanjay	3/11/2010	40:4-40:7	AA	
Datta, Sanjay	3/11/2010	41:12-41:15	MT	
Datta, Sanjay	3/11/2010	41:23-42:3	AA	
Datta, Sanjay	3/11/2010	42:9-42:15	IH, AA	
Datta, Sanjay	3/11/2010	42:16-43:1	CD, O, V	
Datta, Sanjay	3/11/2010	45:8-45:13	30b6	
Datta, Sanjay	3/11/2010			10:13-10:22;

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
				45:14-45:17
DuBow, Steve ²	3/8/2010	15:12-20	103	
DuBow, Steve	3/8/2010	16:15-20	402	
DuBow, Steve	3/8/2010	17:7-10	V	
DuBow, Steve	3/8/2010	17:16-19	NR	
DuBow, Steve	3/8/2010	19:1-3	104a	
DuBow, Steve	3/8/2010	19:22-20:7	402, 403, 901, 802	
DuBow, Steve	3/8/2010	20:12-14	V	
DuBow, Steve	3/8/2010	20:17-20	402, 403, 901, 802	
DuBow, Steve	3/8/2010	21:10-12	103, V	
DuBow, Steve	3/8/2010	21:21-5	V	
DuBow, Steve	3/8/2010	25:13-31:2	802, 104a, 602, DSI	
DuBow, Steve	3/8/2010	31:6-9	602	
DuBow, Steve	3/8/2010	31:16-34:22	802, DSI, 901	
DuBow, Steve	3/8/2010	35:7-36:6	802, DSI, 901	
DuBow, Steve	3/8/2010	36:12-37:21	802, DSI, 901	
DuBow, Steve	3/8/2010	38:2-12	802, 901	
DuBow, Steve	3/8/2010	38:13-17	AA, NR	
DuBow, Steve	3/8/2010	41:11-12	104a	
DuBow, Steve	3/8/2010	63:8-64:10	NR	
DuBow, Steve	3/8/2010	64:11-20	402, 104a, NR	
DuBow, Steve	3/8/2010	85:18-86:18	V, NR	
DuBow, Steve	3/8/2010	110:10-13	104a	
DuBow, Steve	3/8/2010	111:6-113:3	802, 901, DSI	
DuBow, Steve	3/8/2010	113:4-15	104a, 802, 602	
DuBow, Steve	3/8/2010	114:9-12	104a	
DuBow, Steve	3/8/2010	114:13-16	104a, 802	
DuBow, Steve	3/8/2010	114:17-21	104a	
DuBow, Steve	3/8/2010	116:18-22	802, 901	
DuBow, Steve	3/8/2010	117:4-5	802, 104a, V	
DuBow, Steve	3/8/2010	117:13-14	104a	
DuBow, Steve	3/8/2010	117:16-21	AA	
DuBow, Steve	3/8/2010	117:22-118:15	104a, 802,	

² Google objects globally to all designations in this deposition as follows: , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			901, DSI	
DuBow, Steve	3/8/2010	118:16-17	104a	
DuBow, Steve	3/8/2010	119:5-9	104a	
DuBow, Steve	3/8/2010	119:19-120:1	901, 104a, 403	
DuBow, Steve	3/8/2010	120:2-10	A, 104a, 611c	
DuBow, Steve	3/8/2010			121:13-125:6; 126:19-127:5; 128:3-18; 88:9-90:17; 94:4-98:7; 98:9-99:21, 70:6-21; 74:6-81:19; 64:21-69:14
Dulitz, Dan	2/26/2010	26:10-23:12	104a	
Dulitz, Dan	2/26/2010	30:11-30:21	30b6, 104a	
Dulitz, Dan	2/26/2010	45:2-45:17	602, V, O, 104a	
Dulitz, Dan	2/26/2010	54:7-54:16	103,402, 602, 104a	
Dulitz, Dan	2/26/2010	55:1-55:8	103, 402, 602, 104a	
Dulitz, Dan	2/26/2010	55:14-55:17	103, 402, 602, 104a	
Dulitz, Dan	2/26/2010	55:23-56:2	104a, 402, 602	
Dulitz, Dan	2/26/2010	56:5-56:8	AA	
Dulitz, Dan	2/26/2010	56:5-58:2	402	
Dulitz, Dan	2/26/2010	56:17-56:20	AA	
Dulitz, Dan	2/26/2010	58:12-58:16	402	
Dulitz, Dan	2/26/2010	58:24-60:4	402,	
Dulitz, Dan	2/26/2010	60:20-62:18	402, 901, 602, 104a	
Dulitz, Dan	2/26/2010	65:16-19	V, O, 104a, 602, 402	
Dulitz, Dan	2/26/2010	68:24-69:10	104a	
Dulitz, Dan	2/26/2010	68:24-70:6	402	
Dulitz, Dan	2/26/2010	78:14-78:1	402	
Dulitz, Dan	2/26/2010	79:4-80:19	402, 104a,	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			602	
Dulitz, Dan	2/26/2010	82:17-83:21	402, 104a, 602	
Dulitz, Dan	2/26/2010	84:12-84:18	V, 30b6, AA, 402, 104a, 602, V	
Dulitz, Dan	2/26/2010	85:4-85:9	AA	
Dulitz, Dan	2/26/2010	85:9-85:17	AA, 402, 602, 104	
Dulitz, Dan	2/26/2010	85:25-86:6	104a	
Dulitz, Dan	2/26/2010	86:7-86:21	402	
Dulitz, Dan	2/26/2010	91:12-92:14	402	
Dulitz, Dan	2/26/2010	92:17-93:4	402	
Dulitz, Dan	2/26/2010	93:1-93:16	402, 104a, 602	
Dulitz, Dan	2/26/2010	94:22-94:	104a, 402	
Dulitz, Dan	2/26/2010	99:23-100:4	V, 104a, 402	
Dulitz, Dan	2/26/2010	107:3-108:25	402	
Dulitz, Dan	2/26/2010	118:5-119:11	402, 30b6	
Dulitz, Dan	2/26/2010	139:20-141:23	402	
Dulitz, Dan	2/26/2010	142:14-143:1	402	
Dulitz, Dan	2/26/2010	143:21-145:18	402	
Dulitz, Dan	2/26/2010	153:10-156:25	402	
Dulitz, Dan	2/26/2010	155:3-155:8	104a	
Dulitz, Dan	2/26/2010	156:20-156:25	AA	
Dulitz, Dan	2/26/2010			143:2-143:20; 109:1-109:16; 103:10-104:7; 103:4-103:9; 100:18-100:16; 102:5-102:16; 96:6-98:1; 31:5-31:7; 30:1-30:10
Fuloria, Prashant ³	5/18/2006	10:16-11:3	402	
Fuloria, Prashant	5/18/2006	17:17-18:5	402	
Fuloria, Prashant	5/18/2006	22:4-20	402, 403,	

³ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			901, 104a	
Fuloria, Prashant	5/18/2006	23:8-18	402, 403, 901, 104a	
Fuloria, Prashant	5/18/2006	23:24-24:9	402, 403, 901, 104a	
Fuloria, Prashant	5/18/2006	25:23-26:23	402, 403, 104a, 901	
Fuloria, Prashant	5/18/2006	28:1-29:25	402, 403	
Fuloria, Prashant	5/18/2006	31:14-33:11	402, 403, V	
Fuloria, Prashant	5/18/2006	34:4-25	402, 403, 901	
Fuloria, Prashant	5/18/2006	35:1-36:6	402, 403	
Fuloria, Prashant	5/18/2006	36:7-37:5	402, 403	
Fuloria, Prashant	5/18/2006	37:6-9	402, 403, 901	
Fuloria, Prashant	5/18/2006	37:10-12	402, 403	
Fuloria, Prashant	5/18/2006	37:13-18	402, 403, 901	
Fuloria, Prashant	5/18/2006	40:9-23	402, 403, 901	
Fuloria, Prashant	5/18/2006	41:20-44:11	402, 403	
Fuloria, Prashant	5/18/2006	44:12-45:3	402, 403, 104a	
Fuloria, Prashant	5/18/2006	45:24-46:11	402, 403, 104a	
Fuloria, Prashant	5/18/2006	45:12-18	402, 403, 104a, AA	
Fuloria, Prashant	5/18/2006	45:19-47:1	402, 403, 104a	
Fuloria, Prashant	5/18/2006	47:22-48:10	402, 403	
Fuloria, Prashant	5/18/2006	49:14-50:4	402, 403, C	
Fuloria, Prashant	5/18/2006	51:19-52:7	402, 403, MT	
Fuloria, Prashant	5/18/2006	57:1-7	402, C, 104a	
Fuloria, Prashant	5/18/2006	77:14-78:1	402, 403, 104a	
Fuloria, Prashant	5/18/2006	79:6-23	402, 403, CD	
Fuloria, Prashant	5/18/2006	79:24-80:16	402, 403	
Fuloria, Prashant	5/18/2006	83:6-17	402, 403	
Fuloria, Prashant	5/18/2006	85:16-86:3	402, 403,	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			104a, 602, 802	
Fuloria, Prashant	5/18/2006	86:4-89:2	402, 403, 104a, 602	
Fuloria, Prashant	5/18/2006	98:14-99:25	402, 403	
Fuloria, Prashant	5/18/2006	154:24-155:11	402, 403, 104a, 901, 602, CD	
Fuloria, Prashant	5/18/2006	155:12-20	402, 403, 104a, 901, 602	
Fuloria, Prashant	5/18/2006	155:21-156:16	402, 403, 104a, 901, 602, V, CD	
Fuloria, Prashant	5/18/2006	156:17-158:22	402, 403, 104a, 602, 901	
Fuloria, Prashant	5/18/2006	8:7-17	402	
Fuloria, Prashant	5/18/2006			159:2-160:9; 160:11-13; 160:16-161:8; 117:18-118:14; 54:14-25
Fuloria, Prashant ⁴	8/9/2006	195:3-7	402, 403	
Fuloria, Prashant	8/9/2006	195:8-23	402, 403, 104a, 602	
Fuloria, Prashant	8/9/2006	199:23-200:14	DI, 402, 403	
Fuloria, Prashant	8/9/2006	224:22-225:1	402, 403, 901, 104a	
Fuloria, Prashant	8/9/2006	225:2-13	402, 403, 901	
Fuloria, Prashant	8/9/2006	225:24-226:4	402, 403, 901, DI	
Fuloria, Prashant ⁵	8/9/2006	194:22-195:2	402, 403, 104a, 602	
Fuloria, Prashant	8/9/2006			226:5-15;

⁴ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

⁵ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
				199:21-22; 211:8-20
Gultekin, Baris	3/4/2010	15:19-16:6	V	
Gultekin, Baris	3/4/2010	19:25-20:12	602, V	
Gultekin, Baris	3/4/2010	21:20-22:4	602	
Gultekin, Baris	3/4/2010	22:12-22:17	104a, 602	
Gultekin, Baris	3/4/2010	24:20-24:24	602, V	
Gultekin, Baris	3/4/2010	26:11-27:1	104a, 602	
Gultekin, Baris	3/4/2010	37:2-37:10	104a, 602	
Gultekin, Baris	3/4/2010	39:17-39:19	AA	
Gultekin, Baris	3/4/2010	41:15-42:11	402	
Gultekin, Baris	3/4/2010	50:10-50:22	402	
Gultekin, Baris	3/4/2010	52:9-53:11	602, A	
Gultekin, Baris	3/4/2010	54:12-54:14	V	
Gultekin, Baris	3/4/2010	65:18-65:25	104a, 602, V	
Gultekin, Baris	3/4/2010	66:1-66:4	AA, V	
Gultekin, Baris	3/4/2010	72:14-73:6	104a, 602	
Gultekin, Baris	3/4/2010	86:9-86:25	104a	
Gultekin, Baris	3/4/2010	87:1-87:13	CD, V, O	
Gultekin, Baris	3/4/2010	88:15-88:17	602	
Gultekin, Baris	3/4/2010	89:9-89:11	104a	
Gultekin, Baris	3/4/2010	89:15-89:19	104a	
Gultekin, Baris	3/4/2010	97:3-97:20	CD, V	
Gultekin, Baris	3/4/2010	97:23-98:9	104a, 402	
Gultekin, Baris	3/4/2010	101:16-102:21	104a, 602, 802	
Gultekin, Baris	3/4/2010	102:22-104:8	104a, 602	
Gultekin, Baris	3/4/2010	116:18-117:5	104a, 602	
Gultekin, Baris	3/4/2010	119:11-119:23	501, 402	
Gultekin, Baris	3/4/2010	119:24-120:7	402	
Gultekin, Baris	3/4/2010	123:3-124:4	104a, 602	
Gultekin, Baris	3/4/2010	124:12-124:15	AA	
Gultekin, Baris	3/4/2010	124:16-124:22	V	
Gultekin, Baris	3/4/2010	124:23-125:4	AA	
Gultekin, Baris	3/4/2010	125:5-125:8	104a	
Gultekin, Baris	3/4/2010	135:12-135:23	104a, V, O	
Gultekin, Baris	3/4/2010	138:12-138:15	104a	
Gultekin, Baris	3/4/2010	139:4-139:9	V, O	
Gultekin, Baris	3/4/2010	141:5-141:18	602	
Gultekin, Baris	3/4/2010	144:23-144:25	602, V	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Gultekin, Baris	3/4/2010	162:17-162:23	104a	
Gultekin, Baris	3/4/2010	163:23-165:4	104a, 602	
Gultekin, Baris	3/4/2010	169:16-169:19	104a, 602, DI	
Gultekin, Baris	3/4/2010	170:1-170:5	104a	
Gultekin, Baris	3/4/2010	170:9-170:24	104a, 602, AA	
Gultekin, Baris	3/4/2010	171:11-171:16	MT	
Gultekin, Baris	3/4/2010	171:17-172:6	104a, V	
Gultekin, Baris	3/4/2010	172:9-172:11	104a, V, AA	
Gultekin, Baris	3/4/2010	172:12-172:22	V, CD	
Gultekin, Baris	3/4/2010	174:13-174:15	104a, 602	
Gultekin, Baris	3/4/2010	175:7-175:15	103, 104a, V	
Gultekin, Baris	3/4/2010	187:13-188:13	104a, 602	
Gultekin, Baris	3/4/2010			183:1-183:9; 176:3-177:4; 172:23-173:23; 146:3-146:15; 145:8-145:18; 22:18-23:11; 89:20-89:24; 66:17-66:22; 58:1-58:25
Hagan, Rose ⁶	9/30/2004	14:12-15:12	402	
Hagan, Rose	9/30/2004	15:19-23	402	
Hagan, Rose	9/30/2004	2:22-26:3	402, CD, 104a	
Hagan, Rose	9/30/2004	26:14-27:2	402	
Hagan, Rose	9/30/2004	29:19-21	402	
Hagan, Rose	9/30/2004	31:23-33:4	402	
Hagan, Rose	9/30/2004	46:23-47:20	402	
Hagan, Rose	9/30/2004	62:13-63:3	402, V	
Hagan, Rose	9/30/2004	66:23-67:8	402, V, 104a	
Hagan, Rose	9/30/2004	74:13-75:18	402, V, NR, 104a	
Hagan, Rose	9/30/2004	86:21-87:3	402, V, 104a	
Hagan, Rose	9/30/2004	87:11-20	402, V, 104a	
Hagan, Rose	9/30/2004	92:16-93:7	402, DI	

⁶ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Hagan, Rose	9/30/2004	101:14-20	402, IH, 602, 701	
Hagan, Rose	9/30/2004	115:5-16	402, C	
Hagan, Rose	9/30/2004	166:16-167:1	402, C	
Hagan, Rose	9/30/2004	179:4-180:3	402, V	
Hagan, Rose	9/30/2004	210:20-211:11	402, 104a	
Hagan, Rose	9/30/2004	212:24-213:1	DI, 402, V	
Hagan, Rose	9/30/2004	213:6-21	402, DI, V, 802	
Hagan, Rose	9/30/2004	215:10-14	402, DI, V, 104a	
Hagan, Rose	9/30/2004	222:12-223:5	402, 104a, V, IH, 602	
Hagan, Rose	9/30/2004	223:8-25	V, 402, IH, 602, DI	
Hagan, Rose	9/30/2004			224:2-6; 216:4-20; 213:22-214:25; 211:12-17; 165:13-166:15; 174:16-24; 176:5-18; 178:2-25; 189:6-190:7, 105:25-106:10; 106:21-107:6; 96:10-22; 100:7-17; 100:24-101:13; 75:19-22, 24; 76:2-7; 33:5-12; 36:19-37:7; 37:10-11; 47:21-48:1; 48:19-49:1; 27:9-12; 28:2; 28:11-13; 15:24-16:1; 17:4-16
Hagan, Rose ⁷	8/10/2006	136:19-23	402, DI, 104a	

⁷ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Hagan, Rose	8/10/2006	137:17-138:1	402, DI, 104a	
Hagan, Rose	8/10/2006	167:10-168:13	402, 602, CC, 104a, CD	
Hagan, Rose	8/10/2006			136:9-18
Hagan, Rose ⁸	11/29/2006	52:19-53:7	402, DI	
Hagan, Rose	11/29/2006	52:7-15	402, DI	
Hagan, Rose	11/29/2006	57:5-20	402, 403, DI, 104a, CD	
Hagan, Rose	11/29/2006	86:25-87:5	402, 104a	
Hagan, Rose	11/29/2006	90:12-18	402, DI, 403, 802	
Hagan, Rose	11/29/2006	91:1-5	402, DI, 403	
Hagan, Rose	11/29/2006	196:16-197:1	402, 403, DI	
Hagan, Rose	11/29/2006	197:22-198:11	402, 403, DI, 104a, 802	
Hagan, Rose	11/29/2006	199:11-14	402, DI	
Hagan, Rose	11/29/2006	219:18-220:5	402, 403, 602, DI, IH	
Hagan, Rose ⁹	11/29/2006			20:9-12, 14-23; 24:13-25:12; 37:6-9, 13-17, 19; 46:3-12; 47:20-23; 48:13-14; 49:15-3; 52:2-6 37:9-11, 15-18; 56:2-57:3; 85:8011; 87:24-88:3; 88:5-8; 88:21-24; 193:20-22; 194:1-2, 223:16-22, 92:3-11; 143:8-19; 176:18-25; 177:2
Hagan, Rose	3/5/2010	17:9-18:2	402, 403	

⁸ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

⁹ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1) , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Hagan, Rose	3/5/2010	19:3-19:21	402, 403	
Hagan, Rose	3/5/2010	24:16-24:20	V	
Hagan, Rose	3/5/2010	24:16-24:19	402	
Hagan, Rose	3/5/2010	28:25-29:17	104a, 901	
Hagan, Rose	3/5/2010	30:12-30:23	802, 104a	
Hagan, Rose	3/5/2010	31:20-32:23	802, 104a	
Hagan, Rose	3/5/2010	32:24-33:8	A, AA, 104a	
Hagan, Rose	3/5/2010	33:9-33:14	104a	
Hagan, Rose	3/5/2010	37:14-37:19	602, 104a	
Hagan, Rose	3/5/2010	38:21-39:2	104a	
Hagan, Rose	3/5/2010	48:8-48:11	V	
Hagan, Rose	3/5/2010	48:13-49:6	306b, 104a	
Hagan, Rose	3/5/2010	57:13-57:2	V	
Hagan, Rose	3/5/2010	65:6-65:24	104a, 602	
Hagan, Rose	3/5/2010	65:25-66:16	103, 104a	
Hagan, Rose	3/5/2010	69:6-69:16	104a, 602	
Hagan, Rose	3/5/2010	79:25-80:8	V	
Hagan, Rose	3/5/2010	80:9-80:12	104a	
Hagan, Rose	3/5/2010	86:1-86:8	104a	
Hagan, Rose	3/5/2010	96:19-97:3	V	
Hagan, Rose	3/5/2010	98:11-98:17	V	
Hagan, Rose	3/5/2010	116:17-116:22	104a	
Hagan, Rose	3/5/2010	125:21-126:7	104a	
Hagan, Rose	3/5/2010	128:20-128:24	104a	
Hagan, Rose	3/5/2010	135:2-135:7	104a	
Hagan, Rose	3/5/2010	135:2-135:18	402	
Hagan, Rose	3/5/2010	136:18-136:22	104a, 402	
Hagan, Rose	3/5/2010	137:11-137:21	402, 104a	
Hagan, Rose	3/5/2010	137:22-138:7	MT, 104a, 402, 403	
Hagan, Rose	3/5/2010	140:19-140:22	402, 104a	
Hagan, Rose	3/5/2010	141:16-141:22	402, 306b	
Hagan, Rose	3/5/2010	141:23-142:20	901, 402, 802, 306b	
Hagan, Rose	3/5/2010	142:21-143:13	602, 104a, 402, 802, 306b	
Hagan, Rose	3/5/2010	143:14-143:20	306b, 402, V	
Hagan, Rose	3/5/2010	143:22-144:2	V, 104a, 306b, 402	
Hagan, Rose	3/5/2010	148:21-149:19	402, 403,	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			104a	
Hagan, Rose	3/5/2010	151:17-152:21	402, 403, 104a	
Hagan, Rose	3/5/2010	158:21-159:4	V	
Hagan, Rose	3/5/2010	159:21-163:25	901, 602, 30b6, 104a, 802	
Hagan, Rose	3/5/2010	164:4-164:16	901, 104a, 802	
Hagan, Rose	3/5/2010			28:18-28:24; 40:11-41:23; 42:12-43:3; 44:19-45:24; 56:4-56:15; 56:19-57:12; 58:4-58:12; 73:2-73:25; 76:25-77:4; 80:18-81:17; 81:22-82:7; 86:13-86:20; 91:4-91:6; 91:17-92:14; 92:23-96:4; 97:11-98:17; 99:18-100:13; 117:19-117:25; 123:13-124:23; 130:23-132:14; 134:2-134:4; 147:10-148:15; 154:17-155:1; 157:22-24; 158:4-158:7; 168:13-168:21; 169:11-169:19; 170:15-171:3; 171:19-171:25
Holden, Richard	3/5/2010	18:21-19:12	104a	
Holden, Richard	3/5/2010	26:3-9	AA	
Holden, Richard	3/5/2010	27:18-23	104a, 602	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Holden, Richard	3/5/2010	27:24-28:17	104a, 602	
Holden, Richard	3/5/2010	28:18-25	MT, 104a, 103, 602	
Holden, Richard	3/5/2010	110:13-11:4	104a, 602, 402, 901, 802	
Holden, Richard	3/5/2010	111:14-25	104a, 602, 402	
Holden, Richard	3/5/2010	118:19-23	802, 402	
Holden, Richard	3/5/2010	120:12-121:8	802, 602, 402, CD	
Holden, Richard	3/5/2010	121:15-122:18	802, AA, 104a, CD	
Holden, Richard	3/5/2010	122:20-23	AA	
Holden, Richard	3/5/2010	123:7-124:8	AA, 802, 402, 602	
Holden, Richard	3/5/2010	124:10-25	MT, AA, A	
Holden, Richard	3/5/2010	125:3-11	A, AA, 402	
Holden, Richard	3/5/2010	125:17-126:14	AA, A, 402, 104a	
Holden, Richard	3/5/2010	126:16-20	402	
Holden, Richard	3/5/2010	126:22-25	802, 402	
Holden, Richard	3/5/2010	127:1-15	A, 802, 402, AA	
Holden, Richard	3/5/2010			17:15-18:20; 19:13-14; 19:18-20:9; 112:16-113:7
Jeffries, Deborah ¹⁰	3/9/2010	14:8-14:17	403, 802	
Jeffries, Deborah	3/9/2010	14:18-15:17	104a, 402, 403, V	
Jeffries, Deborah	3/9/2010	16:6-16:7	103, 104a	
Jeffries, Deborah	3/9/2010	16:8-16:14	802	
Jeffries, Deborah	3/9/2010	16:15-16:19	104a	
Jeffries, Deborah	3/9/2010	18:8-18:20	802, DSI	
Jeffries, Deborah	3/9/2010	19:3-19:9	802	
Jeffries, Deborah	3/9/2010	20:2-20:7	V	
Jeffries, Deborah	3/9/2010	20:8-20:11	104a	
Jeffries, Deborah	3/9/2010	20:18-20:22	104a	

¹⁰ Google objects globally to all designations in this deposition as follows: 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Jeffries, Deborah	3/9/2010	24:6-24:9	104a	
Jeffries, Deborah	3/9/2010	27:18-28:2	104a, 602	
Jeffries, Deborah	3/9/2010	28:17-28:20	104a, 802, DSI	
Jeffries, Deborah	3/9/2010	29:11-32:20	802, 901, DSI	
Jeffries, Deborah	3/9/2010	34:11-34:14	802	
Jeffries, Deborah	3/9/2010	37:10-37:17	104a	
Jeffries, Deborah	3/9/2010	38:17-39:3	104a, 802, 901, DSI	
Jeffries, Deborah	3/9/2010	39:4-39:14	104a, 402, 403, 802, 901, DSI	
Jeffries, Deborah	3/9/2010	41:6-41:7	402, 403	
Jeffries, Deborah	3/9/2010	41:8-41:10	104a, 402, 403	
Jeffries, Deborah	3/9/2010	41:11-41:20	402, 403	
Jeffries, Deborah	3/9/2010			
Jeffries, Deborah	3/9/2010			
Jeffries, Deborah	3/9/2010	58:18-59:1	104a, 802, 901, DSI	
Jeffries, Deborah	3/9/2010	78:6-79:2	402	
Jeffries, Deborah	3/9/2010			79:22-80:19;79:3-79:9; 60:12-77:15; 48:3-52:11; 46:21-47:19
Karen, Alana	3/2/2010	14:8-16	402, 403	
Karen, Alana	3/2/2010	14:24-16:6	402, 403	
Karen, Alana	3/2/2010	21:11-17	104a	
Karen, Alana	3/2/2010	23:3-11	V, 402, 403	
Karen, Alana	3/2/2010	95:3-18	901, 104a, 402, 403	
Karen, Alana	3/2/2010	95:19-96:4	402, 403, 104a	
Karen, Alana	3/2/2010	96:5-20	402, 403, 104a, 802	
Karen, Alana	3/2/2010	96:21-97	402, 403, 104a, 602, 802	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Lloyd, Bill	3/10/2010	14:1-7	CD	
Lloyd, Bill	3/10/2010	15:1-3	AA	
Lloyd, Bill	3/10/2010	16:5-7	V	
Lloyd, Bill	3/10/2010	17:17-23	V, 104a	
Lloyd, Bill	3/10/2010	17:25-18:8	104a	
Lloyd, Bill	3/10/2010	18:9-17	104a, V, CD	
Lloyd, Bill	3/10/2010	27:15-20	104a	
Lloyd, Bill	3/10/2010	30:14-31:25	402	
Lloyd, Bill	3/10/2010	34:10-20	V, 104a	
Lloyd, Bill	3/10/2010	34:21-25	V	
Lloyd, Bill	3/10/2010	35:7-36:20	602, O	
Lloyd, Bill	3/10/2010	36:21-37:20	V, 104a	
Lloyd, Bill	3/10/2010	37:22-38:5	MT, 104a	
Lloyd, Bill	3/10/2010	38:7-14	MT, 104a	
Lloyd, Bill	3/10/2010	38:16-24	V	
Lloyd, Bill	3/10/2010	39:12-40:5	402, 403, 602	
Lloyd, Bill	3/10/2010	44:20-45:1	V, CD	
Lloyd, Bill	3/10/2010	45:3-12	104a, 402, 403	
Lloyd, Bill	3/10/2010	47:7-11	104a	
Lloyd, Bill	3/10/2010	47:12-18	V, 104a	
Lloyd, Bill	3/10/2010	47:20-48:8	V, 602, 104a	
Lloyd, Bill	3/10/2010	50:21-51:2	V	
Lloyd, Bill	3/10/2010	51:10-15	AA	
Lloyd, Bill	3/10/2010	51:16-22	104a	
Lloyd, Bill	3/10/2010	52:10-24	104a, V	
Lloyd, Bill	3/10/2010	55:14-24	402, 602	
Lloyd, Bill	3/10/2010	56:2-7	402	
Lloyd, Bill	3/10/2010	57:58:25	104a, 402, 403, 802	
Lloyd, Bill	3/10/2010	59:1-21	104a, 103, 402, 403, 602	
Lloyd, Bill	3/10/2010	60:13-25	104a, 402, 403	
Lloyd, Bill	3/10/2010	61:22-62:2	V	
Lloyd, Bill	3/10/2010	62:4-8	V	
Lloyd, Bill	3/10/2010	62:13-17	V	
Lloyd, Bill	3/10/2010	62:23-63:14	104a, 602	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Lloyd, Bill	3/10/2010	63:15-64:2	104a, 602	
Lloyd, Bill	3/10/2010	64:12-65:9	104a, 602	
Lloyd, Bill	3/10/2010	74:1-6	104a, V, 602	
Lloyd, Bill	3/10/2010	75:12-77:6	104a, 602	
Lloyd, Bill	3/10/2010	77:11-17	104a, 602	
Lloyd, Bill	3/10/2010	80:22-24	V	
Lloyd, Bill	3/10/2010	84:15-21	AA	
Lloyd, Bill	3/10/2010	90:7-13	104a, V	
Lloyd, Bill	3/10/2010	91:7-23	802, 602	
Lloyd, Bill	3/10/2010	98:8-24	802, 104a, 901, 602	
Lloyd, Bill	3/10/2010	99:2-8	104a, 30b6	
Lloyd, Bill	3/10/2010	99:10-101:1	802, 104a, 901, 602	
Lloyd, Bill	3/10/2010	101:2-11	AA, 402	
Lloyd, Bill	3/10/2010	113:8-13	V, 104a, 402	
Lloyd, Bill	3/10/2010	114:14-115:13	104a, 802, 901	
Lloyd, Bill	3/10/2010	115:14-20	104a, 802, 901, MT	
Lloyd, Bill	3/10/2010	115:23-117:3	104a, 802, 901	
Lloyd, Bill	3/10/2010	117:17-118:13	104a, 103, MT, 602	
Lloyd, Bill	3/10/2010	122:6-14	104a, 602	
Lloyd, Bill	3/10/2010	122:15-18	602	
Lloyd, Bill	3/10/2010	122:19-24	104a, 602	
Lloyd, Bill	3/10/2010	123:6-8	602	
Lloyd, Bill	3/10/2010	123:9-12	104a, 602	
Lloyd, Bill	3/10/2010	123:13-17	104a, 602	
Lloyd, Bill	3/10/2010			61:11; 13-16
Louie, Cory	2/25/2010	11:8-13	V	
Louie, Cory	2/25/2010	15:4-9	V	
Louie, Cory	2/25/2010	16:6-13	V	
Louie, Cory	2/25/2010	17:6-24	V, O, 602	
Louie, Cory	2/25/2010	17:25-18:12	V, O, 602	
Louie, Cory	2/25/2010	18:13-22:3	V, O, 602	
Louie, Cory	2/25/2010	24:24-25:11	V, 602, 104a	
Louie, Cory	2/25/2010	25:12-26:5	104a, 602	
Louie, Cory	2/25/2010	28:2-11	CD	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Louie, Cory	2/25/2010	33:2-12	104a, 602	
Louie, Cory	2/25/2010	33:19-25	104a, 602	
Louie, Cory	2/25/2010	34:1-5	602, V, 104a	
Louie, Cory	2/25/2010	24:6-25	602, 104a	
Louie, Cory	2/25/2010	35:16-36:4	AA	
Louie, Cory	2/25/2010	36:5-8	CD	
Louie, Cory	2/25/2010	37:4-9	MT	
Louie, Cory	2/25/2010	37:13-23	602	
Louie, Cory	2/25/2010	37:24-38:7	CD, 602	
Louie, Cory	2/25/2010	38:16-25	602	
Louie, Cory	2/25/2010	39:1-15	CD, V	
Louie, Cory	2/25/2010	39:16-18	104a, 602	
Louie, Cory	2/25/2010	39:21-40:15	V	
Louie, Cory	2/25/2010	40:16-20	MT, 103	
Louie, Cory	2/25/2010	42:13-22	V	
Louie, Cory	2/25/2010	51:11-15	104a	
Louie, Cory	2/25/2010	57:17-58:11	V	
Louie, Cory	2/25/2010	64:24-65:5	V, 402	
Louie, Cory	2/25/2010	65:6-23	V, 402	
Louie, Cory	2/25/2010	66:11-18	402	
Louie, Cory	2/25/2010	71:24-73:2	V, O, 602, AA, 402	
Louie, Cory	2/25/2010	86:10-87:1	DI, V, 104a	
Louie, Cory	2/25/2010	91:24-92:7	602	
Louie, Cory	2/25/2010	123:7-18	104a, 901	
Louie, Cory	2/25/2010	124:16-24	802	
Louie, Cory	2/25/2010	124:25-125:13	802, 104a	
Louie, Cory	2/25/2010	125:17-127:2	104a, 802	
Louie, Cory	2/25/2010	127:3-10	104a, 602	
Louie, Cory	2/25/2010	129:7-131:2	104a, 802	
Louie, Cory	2/25/2010	131:3-132:2	104a, 602	
Louie, Cory	2/25/2010	133:1-12	104a, 802, 602, DSI	
Louie, Cory	2/25/2010	133:20-22	V	
Louie, Cory	2/25/2010	134:11-23	104a, 602, 802, DSI	
Louie, Cory	2/25/2010			86:8-9; 14:25-15:3

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Page, Larry ¹¹	1/1/2007	70:13-22	CC, IH, 602, 701, 402, 403	
Page, Larry	1/1/2007	72:8-19	CC, IH, 104a, 402, 602, 701	
Page, Larry	1/1/2007	82:17-25	403, C, 104a, 602	
Page, Larry	1/1/2007	83:1-7	CC, IH, 103, 104a, 402, 403, 602, 701	
Page, Larry	1/1/2007	97:19-98:4	104a, 402, 403, 602	70:3-12; 99:7-23, 129:21-130:11; 131:20-132:11; 136:13-24
Porter, Rita Kay ¹²	3/10/2010	15:10-16:6	104a, 802, 901	
Porter, Rita Kay	3/10/2010	16:19-17:22	104a, 602, 901	
Porter, Rita Kay	3/10/2010	17:25-18:14	104a, 901, CD	
Porter, Rita Kay	3/10/2010	18:23-19:25	602, 901	
Porter, Rita Kay	3/10/2010	20:18-21:6	602, 802	
Porter, Rita Kay	3/10/2010	21:10-21:14	V	
Porter, Rita Kay	3/10/2010	22:8-22:11	AA	
Porter, Rita Kay	3/10/2010	22:15-22:23	104a, 701	
Porter, Rita Kay	3/10/2010	23:13-23:17	104a	
Porter, Rita Kay	3/10/2010	24:16-24:20	104a, 602	
Porter, Rita Kay	3/10/2010	24:21-26:8	602, 802, DSI	
Porter, Rita Kay	3/10/2010	26:18-27:4	104a	
Porter, Rita Kay	3/10/2010	27:18-27:22	104a, DSI	
Porter, Rita Kay	3/10/2010	28:6-28:13	402, 802, V	
Porter, Rita Kay	3/10/2010	29:1-29:24	802, DSI	
Porter, Rita Kay	3/10/2010	29:25-30:9	802	
Porter, Rita Kay	3/10/2010	30:10-30:17	104a, 602, 802	
Porter, Rita Kay	3/10/2010	31:10-31:22	602, 802	

¹¹ Google objects globally to all designations in this deposition as follows: 802, Rule 26(a)(1), 402, 403

¹² Google objects globally to all designations in this deposition as follows: , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Porter, Rita Kay	3/10/2010	32:20-32:22	AA	
Porter, Rita Kay	3/10/2010	33:1-33:2	802	
Porter, Rita Kay	3/10/2010	33:18-33:20	104a	
Porter, Rita Kay	3/10/2010	33:23-24:15	802, 901	
Porter, Rita Kay	3/10/2010	35:2-35:14	802	
Porter, Rita Kay	3/10/2010	35:23-36:5	802	
Porter, Rita Kay	3/10/2010	37:18-38:2	802	
Porter, Rita Kay	3/10/2010	38:10-38:18	104a, 611c, 901	
Porter, Rita Kay	3/10/2010	38:19-38:22	DSI	
Porter, Rita Kay	3/10/2010	39:1-39:10	802	
Porter, Rita Kay	3/10/2010	40:14-40:17	802, DI	
Porter, Rita Kay	3/10/2010	40:22-41:10	104a, 402, 802, DSI	
Porter, Rita Kay	3/10/2010	41:25-42:3	CD	
Porter, Rita Kay	3/10/2010	42:6-42:7	611c	
Porter, Rita Kay	3/10/2010	53:2-53:11	602, DI	
Porter, Rita Kay	3/10/2010	73:8-73:14	802, 901, DI	
Porter, Rita Kay	3/10/2010	73:15-74:6	802, 901	
Porter, Rita Kay	3/10/2010			18:21-18:22; 27:17; 40:13; 43:22-46:3; 48:10-49:11; 43:5-43:15; 43:22-46:3; 48:10-49:11; 43:5-43:15; 78:4-78:25; 76:18-78:2; 75:9-76:15; 74:19-75:7; 73:7; 61:16-68:14; 54:14-58:25; 53:12-54:9; 53:12-54:9; 53:1; 49:14-52:15
Sharma, Nitin	3/11/2010	17:3-17:12	V, DI	
Sharma, Nitin	3/11/2010	20:12-18	AA, 402, 403	
Sharma, Nitin	3/11/2010	21:1-19	402, 403	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Sharma, Nitin	3/11/2010	24:6-24:20	AA, 402, 403	
Sharma, Nitin	3/11/2010	25:13-19	30b6, DI, 104a	
Sharma, Nitin	3/11/2010	29:7-29:18	V	
Sharma, Nitin	3/11/2010	31:17-23	AA	
Sharma, Nitin	3/11/2010	33:6-10	AA	
Sharma, Nitin	3/11/2010	38:11-16	CD	
Sharma, Nitin	3/11/2010	52:15-21	104a, 30b6	
Sharma, Nitin	3/11/2010	54:9-22	AA	
Sharma, Nitin	3/11/2010	61:17-20	DI	
Sharma, Nitin	3/11/2010	64:16-25	602, 104a, 30b6	
Sharma, Nitin	3/11/2010	65:1-9	30b6, 104a	
Sharma, Nitin	3/11/2010	67:7-68:25	602, 104a, 30b6	
Sharma, Nitin	3/11/2010	74:25-75:7	104a, 602	
Sharma, Nitin	3/11/2010			25:13-25:19; 61:20
Stanley, Diana ¹³	3/9/2010	7:11-9:3	402	
Stanley, Diana	3/9/2010	12:4-9	103, 602	
Stanley, Diana	3/9/2010	12:16-22	802	
Stanley, Diana	3/9/2010	14:10-14	V, 104a	
Stanley, Diana	3/9/2010	15:2-11	901, 402, 403, 802	
Stanley, Diana	3/9/2010	16:4-9	V, CD, 103, 104a	
Stanley, Diana	3/9/2010	16:10-19	802, 602	
Stanley, Diana	3/9/2010	16:21-17:5	CC, 602, V	
Stanley, Diana	3/9/2010	17:6-20	901, 402, 403, 104a, 802	
Stanley, Diana	3/9/2010	17:21-18:3	V, 602, 103	
Stanley, Diana	3/9/2010	22:11-23:2	802, DSI, 901	
Stanley, Diana	3/9/2010	23:13-24:6	802	
Stanley, Diana	3/9/2010	25:17-26:6	802, 602, 901	
Stanley, Diana	3/9/2010	27:11-28:5	802, 402	
Stanley, Diana	3/9/2010	28:15-21	802, 402	
Stanley, Diana	3/9/2010	31:5-9	802, 901, 402	
Stanley, Diana	3/9/2010	31:11-18	802, 901, 402,	

¹³ Google objects globally to all designations in this deposition as follows: , 402, 403

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
			AA	
Stanley, Diana	3/9/2010	31:19-32:8	802, 901, 402, DSI	
Stanley, Diana	3/9/2010	32:9-14	802, 901, 602, 402, 104a	
Stanley, Diana	3/9/2010	32:15-18	802, 901, 602, 402	
Stanley, Diana	3/9/2010	32:19-22	AA	
Stanley, Diana	3/9/2010	33:1-5	901, 602, 802, 104a	
Stanley, Diana	3/9/2010	33:21-34:9	901, 602, 402, 802	
Stanley, Diana	3/9/2010	33:10-14	901, 602, 402, 802, 104a	
Stanley, Diana	3/9/2010	33:15-19	901, 602, 402, 802	
Stanley, Diana	3/9/2010	83:2-13	901, 402, 802	
Stanley, Diana	3/9/2010	83:14-16	AA	
Stanley, Diana	3/9/2010	84:6-12	802, A, 611c	
Stanley, Diana	3/9/2010	84:13-17	802	
Stanley, Diana	3/9/2010			5:12-13; 21:17-19; 22:3-7; 35:17-36:9; 38:3-4; 38:8-10; 38:17-22; 39:15-18; 40:21-41:4; 41:8-15; 41:20-42:5; 42:9-14; 42:18-43:1; 43:3-15; 45:19-46:12; 47:12-18; 48:22-49:3; 53:20-54:6; 54:16-22; 62:9-15; 70:8-20, 22; 71:1-9; 71:11-72:14; 73:9-21; 74:12-21; 74:22-75:4; 75:6
Vij, Ashish	3/3/2010	11:20-11:23	104a, DI	
Vij, Ashish	3/3/2010	25:6-25:11	104a, V	
Vij, Ashish	3/3/2010	25:13-25:21	V, 602	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Vij, Ashish	3/3/2010	27:1-27:5	104a, V, 402	
Vij, Ashish	3/3/2010	27:7-27:12	104a, V, 402	
Vij, Ashish	3/3/2010	27:13-27:17	104a, V	
Vij, Ashish	3/3/2010	27:18-28:13	104a, V	
Vij, Ashish	3/3/2010	51:9-51:17	V, 104a, 602	
Vij, Ashish	3/3/2010			6:10-6:11; 6:18-6:20; 6:24-7:4; 9:1-9:14; 10:15-11:18; 11:24-12:5
Wojcicki, Susan	3/18/2010	6:17-7:13	DI	
Wojcicki, Susan	3/18/2010	9:16-20	V, O	
Wojcicki, Susan	3/18/2010	11:16-25	O, V, 104a, 402	
Wojcicki, Susan	3/18/2010	15:22-16:7	104a, 103, 402	
Wojcicki, Susan	3/18/2010	21:6-9	104a, 103, 402	
Wojcicki, Susan	3/18/2010	21:10-22:11	402	
Wojcicki, Susan	3/18/2010	24:9-20	402	
Wojcicki, Susan	3/18/2010	24:21-25:4	402, 104a, 602	
Wojcicki, Susan	3/18/2010	25:5-14	402	
Wojcicki, Susan	3/18/2010	37:3-7	V, O	
Wojcicki, Susan	3/18/2010	38:15-19	103, 402	
Wojcicki, Susan	3/18/2010	38:25-39:9	602, 104a	
Wojcicki, Susan	3/18/2010	50:16-51:16	V, CD, 103, 602, IH	
Wojcicki, Susan	3/18/2010	71:3-72:1	CD	
Wojcicki, Susan	3/18/2010	72:15-73:19	104a, 901, 602	
Wojcicki, Susan	3/18/2010	78:13-79:3	602, 901, V, 104a	
Wojcicki, Susan	3/18/2010	79:4-19	MT, V, 901, 602, 104a	
Wojcicki, Susan	3/18/2010	80:2-18	V, 104a, 602	
Wojcicki, Susan	3/18/2010	83:15-84:8	V, 104a, 901, 602	
Wojcicki, Susan	3/18/2010	84:13-20	AA, 104a, 901, 602	
Wojcicki, Susan	3/18/2010	84:22-85:10	104a, AA	

Name	Date	Rosetta Stone's Designated Depo Testimony	Objections¹	Google's Counter Designated Testimony
Wojcicki, Susan	3/18/2010	121:12-122:8	104a, 901, 602	
Wojcicki, Susan	3/18/2010	130:2-131:3	602	
Wojcicki, Susan	3/18/2010	132:22-133:10	104a, 602	
Wojcicki, Susan	3/18/2010	137:14-17	AA	
Wojcicki, Susan	3/18/2010	143:1-144:19	901, 802, 104a, 402, 403	
Wojcicki, Susan	3/18/2010	144:20-145:13	AA, 103, 104a, 402, 403	
Wojcicki, Susan	3/18/2010	146:6-12	104a, 602	
Wojcicki, Susan	3/18/2010	154:14-155:6	402	
Wojcicki, Susan	3/18/2010	163:6-10	V, 402, 104a	
Wojcicki, Susan	3/18/2010	164:9-21	CD, 802	
Wojcicki, Susan	3/18/2010	165:1-16	V, 602, 402	
Wojcicki, Susan	3/18/2010	201:22-202:19	DI, 104a, 602, AA, 103	
Wojcicki, Susan	3/18/2010	203:11-204:5	104a, 802, 901	
Wojcicki, Susan	3/18/2010	204:19-205:13	104a, 802, 901	
Wojcicki, Susan	3/18/2010	205:25-207:1	V, 104a	
Wojcicki, Susan	3/18/2010	207:2-20	104a, 103, 602	
Wojcicki, Susan	3/18/2010	207:21-208:7	V, 602, 104a	
Wojcicki, Susan	3/18/2010	208:8-23	104a, 103, 602	
Wojcicki, Susan	3/18/2010	208:25-210:4	V, A, 104a, 602	
Wojcicki, Susan	3/18/2010	210:5-211:6	104a	
Wojcicki, Susan	3/18/2010	211:7-25	104a, 103, 602	
Wojcicki, Susan	3/18/2010			6:16; 17:9-18:13; 201:21

II. OBJECTIONS TO ROSETTA STONE'S TRIAL EXHIBITS

Google hereby objects to the admission into evidence of the trial exhibits identified by Rosetta Stone in its pre-trial disclosures as indicated on Exhibit A hereto. Google reserves its

right to object, or to not object, to the entry into evidence of any exhibit on any basis, notwithstanding any objection or non-objection in Exhibit A. Google further reserves its right to amend and/or supplement its objections to the extent permitted by this Court's rules, and does not waive its right to object to documents under the attorney-client, work product, or other applicable privileges.

Because the admissibility of an exhibit is dependent on the context, the inclusion of a trial exhibit in Google's own pre-trial disclosures is not a waiver and should not be construed as a waiver of the right to object to the admission or the use of an exhibit when offered by Plaintiff.

Dated: April 9, 2010

Respectfully Submitted,

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By counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of April, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which then sent a notification of such filing (NEF) to the following:

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