

EXHIBIT A

Defendants' Exhibit A
Excerpts From Plaintiff's Initial Discovery Requests
Addressed to the Respective Defendants

Requests for Documents – Exemplar Definitions and Requests

Definitions

15. The term “Accused Products” shall mean:

- a. all of YOUR websites and webpages for which Interval has provided a claim chart in this litigation or which is included in any revised claim chart provided by Interval in this litigation;
- b. Each of YOUR websites, webpages, or portions of a website or webpage that provides content recommendations to a user that are related to content items being viewed by that user, including the portions of the websites identified in ¶ 26 of the Complaint, or identified in Interval’s Infringement Contentions, served on December 28, 2010;
- c. Google AdSense;
- d. Google Display Network;
- e. GMail Spam Filter;
- f. Google Books’s automated book classification system;
- g. GMail Notifier;
- h. Google Talk and Google Talk Labs Edition;
- i. Google Desktop and the associated gadgets software;
- j. Elements of the Android operating system and associated software as described in ¶¶ 44 and 54 of the Complaint;
- k. Each of Your websites, webpages, and systems, or portions of a website, webpage, or system that provides recommendations to users based at least in part on other users’ activities, including the portions of Google Blog Search, Google Buzz, Google Knol, Google News, Google Products, Google Reader, and Orkut identified ¶ 65 of the Complaint, or identified in Interval’s Infringement Contentions, served on December 28, 2010.

16. The term “Relevant Product” refers to each of Your applications, programs, or websites that provides users with recommendations or suggestions on any non-random basis of content other than or in addition to content requested by the user.

Requests

REQUEST FOR PRODUCTION NO. 22:

All documents, including but not limited to source code (with comments), design documents, interface or product specifications, schematics, block diagrams, flowcharts, models, drawings, promotional literature, advertising, engineering design, engineering analysis and testing, engineering notebooks, user manuals, instruction manuals, installation manuals, engineering/technical manuals, operation manuals, training manuals, how-to manuals, troubleshooting manuals, testing manuals, sales manuals, white papers, red books, catalogs, and operation documents, concerning the Accused Products or any Relevant Products.