

**EXHIBIT A**  
**PUBLIC VERSION**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 13-919-LPS
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT GOOGLE LLC'S OBJECTIONS AND RESPONSES TO  
ARENDI S.A.R.L.'S RULE 30(B)(6) NOTICE OF DEPOSITION**

Defendant Google LLC (“Defendant” and/or “Google”) objects and responds to Arendi S.A.R.L. (“Arendi”)’s Notice of Federal Rule of Civil Procedure 30(b)(6) Deposition of Google LLC (“the Notice”). Google serves these objections while reserving all rights to assert additional objections, or to modify these objections, prior to, during, and after any deposition taken pursuant to the Notice, including objections as to the competency, relevancy, materiality, privilege, or admissibility of testimony, the scope of corporate testimony, and the reasonableness, particularity, burden, and breadth of each topic within the Notice.

### **GENERAL OBJECTIONS**

1. Google objects to the proposed deposition date in the Notice, and also objects to the proposed location in the Notice. Google agrees to meet and confer with Arendi to determine mutually acceptable dates and locations for the deposition.

2. Google objects to the Notice to the extent that it conflicts or is inconsistent with any order, stipulation, federal or local rule, or agreement setting limits on the length, topics, and/or other relevant aspect of Rule 30(b)(6) deposition testimony sought by the Notice

3. Google may designate one or more corporate witnesses in response to this Notice. To the extent that Arendi seeks to depose such witnesses in their individual capacity, Google objects to producing any witness for more than one seven-hour deposition. Should Arendi wish to depose any Rule 30(b)(6) witness in his or her individual capacity, Arendi must do so at the same time, and within the same one-day, seven-hour period, as the Rule 30(b)(6) deposition.

4. Google makes no incidental or implied admissions by serving these objections and responses. Accordingly, Arendi shall not construe Google’s objections and responses to any request as an admission that Google accepts or admits the existence of any facts assumed by the request, and Arendi shall not construe or attempt to use Google’s responses or objections as

admissible evidence of any such assumed facts.

5. Any witness Google designates to testify on its behalf in response to the Notice will only testify based on Google's good-faith efforts to conduct a reasonable and diligent search for responsive information, and will testify without prejudice to Google's right to produce or rely on any subsequently discovered information. Google specifically reserves the right to make use of, or to introduce at any subsequent hearing or trial, information that falls within the topics but is discovered subsequent to the deposition(s).

6. Google objects to the Notice to the extent that it requires testimony on matters subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege or protection from disclosure. Google claims such privileges and protections to the extent implicated by each topic, and will exclude privileged and protected information from any testimony it may offer in response to the Notice. Any disclosure of such protected or privileged information is inadvertent and is not intended to waive those privileges or protections.

7. Google objects to the Notice and the topics therein as overly broad, unduly burdensome, oppressive and oppressive insofar as it purports to require testimony covering topics and time periods not relevant to Arendi's claims against Google, or Google's defenses to Arendi's claims. Google further objects to the Notice to the extent that it does not "describe with reasonable particularity the matters for examination" as required by Rule 30(b)(6).

8. Google objects to the Notice and the topics therein on the ground that the burden and/or expense of the proposed discovery outweighs its likely benefit, the scope of discovery Arendi seeks is not proportional to the needs of the case, and other forms of obtaining discovery- e.g., written discovery-are more appropriate and far less burdensome than discovery via a Rule 30(b)(6) deposition. In particular, it is improper to seek Google's legal contentions and factual

bases therefor via a Rule 30(b)(6) deposition. Google objects to any topic seeking corporate testimony on such improper subject matters.

9. Google objects to the Notice to the extent it purports to seek testimony based on information not within Google's possession, custody, or control. By agreeing to present a witness for any of the topics in the Notice, Google does not represent that it has information or knowledge responsive to such topics.

10. Discovery is not yet complete and Google's investigation relating to this lawsuit is continuing. Google's responses to the Notice, and any deposition testimony it provides in response to the Notice, are based upon and reflect the current state of its knowledge, and are made without prejudice to Google's production and use of subsequently discovered evidence or interpretations thereof. Google reserves the right to produce, and/or use any evidence discovered subsequent to any depositions in response to the Notice.

11. Google will only provide testimony regarding confidential information under the confidentiality provisions recited in the Stipulated Protective Order, and only to the extent that such testimony does not violate any applicable right to privacy, third-party confidentiality restrictions, and any other applicable Order, law, rule, or agreement. Google objects to the Notice to the extent that it purports to impose on Google any obligation that is different from or greater than any obligation imposed by the Federal Rules of Civil Procedure and the Local Rules of the United States Court for the District of Delaware.

12. Google objects to the Notice's definition of "You", "Google" or "Defendant" as overly broad and unduly burdensome to the extent it purports to cover unidentified third-parties that are not controlled by Google. For purposes of the Notice, Google defines "You," "Google," or "Defendant" as Google LLC, but does not include any Google employees acting on their own

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