

Exhibit B

PUBLIC VERSION

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

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	C.A. No. 13-919-LPS
v.)	
)	JURY TRIAL DEMANDED
GOOGLE INC.,)	
)	
Defendant.)	

**GOOGLE, INC.’S OBJECTIONS AND RESPONSES TO PLAINTIFF
ARENDI S.A.R.L.’S FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Google, Inc. (“Google”), by its attorneys, Kaye Scholer LLP, objects and responds to Plaintiff Arendi S.A.R.L.’s (“Plaintiff”) First Set of Requests for Production of Documents(the “Requests”) as follows:

GENERAL OBJECTIONS

1. Google objects to the Requests to the extent that they seek information or material protected by the attorney-client privilege, the work-product doctrine, the joint defense privilege, or any other applicable privilege, immunity, or protection. Any inadvertent production of any privileged documents in response to the Requests is not intended to constitute a waiver of any applicable privilege and/or protection.

2. Google objects to the Requests to the extent that any of them, read alone or in conjunction with the “Definitions” and/or “Instructions,” purports to impose obligations not imposed or contemplated by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Delaware, or any agreements or stipulations entered into by the parties.

3. Google objects to the Requests to the extent that they seek documents that are not relevant to the subject matter of this action and/or not reasonably calculated to lead to the discovery of admissible evidence.

4. Google objects to the Requests to the extent that they seek documents that are already in Plaintiff's possession, custody, or control, or that are publicly available or are as readily available to Plaintiff as they are to Google.

5. Google objects to the Requests to the extent that they seek documents whose disclosure is governed by Google's agreements with third parties, including confidentiality agreements. Google will produce such documents only after complying with, and in compliance with, the terms of such third-party agreements.

6. Google objects to the Requests to the extent that they are vague, ambiguous, overly broad, unduly burdensome, unreasonably cumulative, or duplicative.

7. Google expressly reserves the right to object to the admissibility at trial of these Responses and Objections or any documents or information produced in response to these Requests. Neither Google's Responses and Objections to the Requests nor the production of materials in response to the Requests is intended as an admission or concession of the admissibility of any information contained herein.

8. Google objects to the Requests to the extent that they assume disputed facts or legal conclusions in defining the information requested. Google denies any such disputed facts or legal conclusions assumed by the Requests, and any response or objection to any Request is without prejudice to this objection.

9. Google objects to the Requests, and to each and every individual request contained therein, to the extent that they call for Google to identify privileged documents created after the filing of this lawsuit on the grounds that such Requests are overly broad and burdensome and not reasonably calculated to lead to the discovery of admissible evidence, and would call for counsel to review all of its files and list most of the documents therein on a privilege log.

10. Google objects to the Requests to the extent that they seek information protected by or involving trade secrets or other confidential research, development, proprietary or commercial information that would not be covered by the Protective Order, or similar Order issued by the Court.

11. Google objects to the Requests to the extent they call for production of documents that are not within its possession, custody, or control.

12. Google objects to the Requests to the extent they use undefined, vague, and ambiguous terms.

13. Google objects to the Requests to the extent they purport to require Google to draw a legal conclusion concerning the meaning or application of any terms or phrases used.

14. Google objects to the Requests to the extent they exceed the limits of permissible discovery allowed under any court order or the local rules.

15. Google reserves the right at any time to revise, correct, add to, supplement, or clarify any of the responses contained herein.

16. Google objects to Plaintiff's definitions of "Document" and "Documents" as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

17. Google objects to Plaintiff's definitions of "sale," "sales," "sell," or "sold" as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

18. Google objects to Plaintiff's definitions of "identify" and "identification" as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

19. Google objects to Plaintiff's definitions of "relate to," "related to," "relating to," or "concerning" as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

20. Google objects to Plaintiff's definitions of "you," "your," "yours" or "Defendant" as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

21. Google's agreement to produce responsive documents does not and shall not constitute an admission that such responsive documents in fact exist. Rather, Google's agreement to produce is only an agreement to produce responsive documents found after a reasonable search, if in fact such responsive documents are found to exist.

22. Google will only produce documents relevant to the products actually identified as accused products and charted in Plaintiff's infringement charts as required under the local rules.

23. All of the General Objections set forth herein are hereby incorporated into each specific response set forth below and have the same force and effect as if fully set forth therein.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Documents sufficient to identify on at least a quarterly basis your unit sales for each of the Accused Products by customer and territory.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Google objects to this Request as vague and overly broad. Google objects to this Request to the extent it seeks information or documents protected from discovery by the attorney-client privilege and/or the attorney work-product doctrine, the joint defense privilege, or any other applicable privileges. Google objects to this request as premature in advance of its core technical document production and Plaintiff's infringement contentions. Google objects to this Request on the grounds that the terms and phrases in this Request are vague and ambiguous, including but not limited to "unit sales," "customer," and "territory." Google objects to this Request to the extent it seeks information not relevant to any inquiry in this matter.

Subject to and without waiving the foregoing general and specific objections, Google responds that it will produce relevant documents responsive to this Request to the extent any

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