

Exhibit I

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NETWORK-1 TECHNOLOGIES, INC.,

Plaintiff,

v.

GOOGLE LLC and YOUTUBE, LLC,

Defendants.

14 Civ. 2396 (PGG)

14 Civ. 9558 (PGG)

**AMSTER ROTHSTEIN & EBENSTEIN LLP'S RESPONSES
TO DEFENDANTS' SUBPOENA**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, non-party Amster Rothstein & Ebenstein LLP ("ARE") hereby serves its written responses to Defendants' Notice of Subpoena to it, dated February 21, 2019, in the above-captioned action.

PRELIMINARY STATEMENT

These responses are made solely for the purposes of this action in response to the subpoena. These responses are subject to and without waiver of any objections as to the competency, propriety, authenticity, relevancy, materiality, privilege, and admissibility, and to any and all other objections on any grounds that would require the exclusion of statements contained.

The following responses are given without prejudice to ARE's right to produce evidence of any subsequently discovered fact or facts that it may later recall or discover. ARE further reserves the right to change, amend, or supplement any or all of the matters contained in this Response with facts or information that it learns were omitted by inadvertence, mistake,

or excusable neglect.

ARE's response to this subpoena is based upon the facts and information currently known and available to it. ARE reserves the right to supplement, amend, modify, or alter its responses to the requests and its production in response to the subpoena.

The assertion of any objection to any of the requests in the subpoena ("Requests") is neither intended as, nor shall in any way be deemed, a waiver of ARE's right to assert that or any other objection at a later date. No incidental or implied admissions are intended by the responses below.

**GENERAL OBJECTIONS, OBJECTIONS TO DEFINITIONS,
AND OBJECTIONS TO INSTRUCTIONS**

1. ARE objects to the Requests to the extent they purport to impose on it obligations that differ from or exceed those required by the Federal Rules of Civil Procedure, the Local Civil Rules and the Local Patent Rules of the United States District Court for the Southern District of New York ("Local Rules"), or any order or ruling by the Court in this action.

2. ARE objects to the Requests to the extent they request information protected from discovery by the attorney-client privilege, the attorney work product doctrine, the mediation privilege, common interest privilege, or any other privilege or restriction on discovery. ARE will not produce information protected by such privileges or restrictions. Any inadvertent or unintentional disclosure of such information shall not be deemed a waiver of any applicable privilege. ARE further reserves the right to object that some information is so confidential and sensitive that it should not be provided absent additional protections adequate to ensure its confidentiality.

3. ARE objects to the Requests to the extent they are vague and ambiguous.

4. ARE objects to the Requests to the extent they purport to require it to search for information that is not within its possession, custody, or control.

5. ARE objects to the Requests to the extent that any Request therein is overbroad, unduly burdensome, oppressive, or may be construed as calling for information not relevant to any claim or defense of any party and/or is not proportional to the needs of the case, considering among other things the importance of the discovery in resolving the issues and whether the burden or expense of the proposed discovery outweighs its likely benefit.

6. ARE objects to the Requests to the extent that any Request therein seeks information that is beyond the scope of allowable discovery under the Federal Rules of Civil Procedure, including but not limited to Federal Rule of Civil Procedure 26(b).

7. ARE objects to the definition of “you” and “your” to the extent Defendants’ definition purports to impose duties beyond those imposed by the Federal Rules of Civil Procedure, the Local Rules, or any order or ruling by the Court in this action. ARE also objects to this definition as unduly burdensome, harassing, oppressive, and overbroad to the extent it purports to include individuals and entities other than Amster Rothstein & Ebenstein LLP. ARE objects to the definition of “you” and “your” as vague and overbroad with respect to its inclusion of “affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by Amster Rothstein & Ebenstein LLP, and all predecessors and successors in interest to such entities, and any entity owned in whole or in part.”

8. ARE objects to the definition of “NETWORK-1” to the extent Defendants’ definition purports to impose duties beyond those imposed by the Federal Rules of Civil Procedure, the Local Rules, or any order or ruling by the Court in this action. Further, ARE

objects to the definition of “NETWORK-1” as broader than permissible under Local Rule 26.3(c)(5). ARE also objects to this definition as unduly burdensome, harassing, oppressive, and overbroad to the extent it purports to include entities other than Network-1 Technologies, Inc. ARE objects to the definition of “NETWORK-1” as vague and overbroad with respect to its inclusion of “affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by Network-1 Technologies, Inc., and all predecessors and successors in interest to such entities, and any entity owned in whole or in part.” Further, ARE objects to the definition of “NETWORK-1” as including “without limitation, Network-1 Security Solutions, Inc.; Mirror Worlds Technologies, LLC; and Mirror Worlds LLC” as overbroad by including entities that are either unrelated to this litigation and/or third parties. ARE will treat the term “NETWORK-1” according to the definition set forth in Local Civil Rule 26.3(c)(5).

9. ARE objects to the definition of “PATENT FAMILY” as impermissibly seeking discovery outside the scope of this litigation because it purports to encompass patents not asserted in this case. ARE will treat the term “PATENT FAMILY” as referring to the “PATENTS-IN-SUIT” as defined in Paragraph 4 of the “Definitions” section of the subpoena.

10. ARE objects to the definition of “PRIOR ART” to the extent the definition includes “publications, patents, physical devices, prototypes, uses, sales, and offers for sale, and any DOCUMENTS or other items” that are not within the scope of 35 U.S.C. §§ 102 and 103.

11. ARE objects to the definitions of “NETWORK-1/GOOGLE PROCEEDINGS” to the extent the definition includes matters that are unrelated to the litigation here. In particular, ARE objects to the inclusion of *Google Inc. v. Network-1 Technologies, Inc.*, IPR2015-00343

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