

Exhibit 36

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

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| -----X | | |
| NETWORK-1 TECHNOLOGIES, INC., | § | |
| | § | |
| Plaintiff, | § | |
| | § | Case No. 1:14-cv-02396-PGG |
| v. | § | |
| | § | |
| GOOGLE INC. and YOUTUBE, LLC | § | |
| | § | |
| | § | |
| Defendants. | § | |
| -----X | | |

**GOOGLE INC. AND YOUTUBE, LLC'S RESPONSES AND OBJECTIONS TO
PLAINTIFF NETWORK-1 TECHNOLOGIES, INC.'S
FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants Google, Inc. and YouTube, LLC (together, "Google") by and through its undersigned counsel, hereby respond and object to the First Set of Requests for Admission (Nos. 1-215) (the "RFAs") of Plaintiff Network-1 Technologies, Inc. ("Network-1"), dated April 9, 2015.

GENERAL RESPONSES

1. Google's responses to the RFAs are based on the best information available to it at the time of drafting, within the limitations and subject to the objections set forth herein.
2. The responses set forth below are for the purposes of discovery only, and Google neither waives nor intends to waive, but expressly reserves, any and all objections it may have to the relevance, competence, materiality, admission, admissibility, or use at trial of any information produced, identified, or referred to herein, or to the introduction of any evidence at trial relating to the subjects covered by such responses.

3. The fact that Google is willing to answer or does not object to any RFA does not constitute an admission or acknowledgment that an RFA is proper, that the information it seeks is relevant or admissible or is within the proper bounds of discovery, or that RFAs for similar information or subject matter will be treated in a similar fashion. Furthermore, by making these responses, Google does not concede that it is in possession of any information responsive to any particular RFA, or that any non-privileged, responsive information actually exists. Nor does Google's response or objection to any Request or part thereof constitute an admission that Google accepts or admits the existence of any facts set forth or assumed by such Request, or that such responses or objections constitute admissible evidence.

4. Google reserves the right at any time to revise, correct, add to, supplement, or clarify any of the responses propounded herein. Google further expressly reserves its right to rely, at any later time including trial, upon additional information not included in its specific responses.

GENERAL OBJECTIONS

1. Google objects to the RFAs to the extent that they call for information subject to a claim of privilege or immunity, including the attorney-client privilege, the attorney work-product doctrine, or any other applicable evidentiary privilege or immunity from disclosure. The inadvertent provision of any information subject to such privileges or immunities is not intended to relinquish any privilege or immunity and shall not be deemed to constitute a waiver of any applicable privilege or immunity.

2. Google objects to the RFAs to the extent that they purport to impose discovery obligations beyond those set forth in the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York, and the Court's Scheduling Order (D.I. 31).

3. Google objects to the RFAs to the extent that they are so vague, ambiguous or confusing as not to be susceptible to a reasoned interpretation or response. Google objects to the RFAs to the extent that terms including, but not limited to, "fingerprint," "Content ID system," "Video ID," "Audio ID," and "technologies" are undefined, and therefore vague, ambiguous, and confusing as not to be susceptible to a reasoned interpretation or response.

4. Google objects to the RFAs to the extent that they call for information unknown to Google.

5. Google objects to the RFAs to the extent that they seek information not relevant to the claims or defenses of either party nor reasonably calculated to lead to the discovery of evidence relevant to the subject matter involved in the Action.

6. Google objects to the RFAs to the extent that they are duplicative, cumulative, or seek information that may be obtained from other sources or through other means of discovery that are more convenient, more efficient, more practical, less burdensome and/or less expensive.

7. Google objects to the RFAs to the extent that they are overly broad, overly expansive, oppressive and/or unduly burdensome and would impose upon Google an unreasonable burden of inquiry.

8. Google objects to the definition of "You" and "Your" as overbroad and unduly burdensome. Google will interpret "You" and "Your" to mean Google Inc. and YouTube, LLC.

9. Google objects to the definition of "Accused Instrumentalities" as vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Google interprets the term "Accused Instrumentalities" to be the products identified in Network-1's Disclosures of Asserted Claims and Infringement Contentions, served on July 21, 2014.

10. Google expressly reserves the right to object to further discovery into the subject matter of the RFAs.

11. Google objects to the RFAs as unduly burdensome to the extent that information requested is within the knowledge of Network-1, can be determined by referring to documents within the possession, custody and control of Network-1 or is within the public domain or otherwise more readily or equally available to Network-1 and thus more conveniently obtained by Network-1.

SPECIFIC RESPONSES AND OBJECTIONS

Each of the foregoing General Responses and Objections are incorporated by reference into each and every specific response set forth below. Notwithstanding the specific response to any RFA, Google does not waive any of its General Responses or Objections. Subject to the General Responses and Objections, and without waiver, modification or limitation thereof, Google's responses and objections to the RFAs are set forth below.

RFA NO. 1:

Admit that You operate the Internet site www.youtube.com ("YouTube site").

RESPONSE TO RFA NO. 1:

Subject to the foregoing General Responses and Objections, Google admits this Request.

RFA NO. 2:

Admit that the YouTube site is a video-sharing platform.

RESPONSE TO RFA NO. 2:

Google incorporates by reference the above General Responses and Objections. Further, Google objects to this Request to the extent it is vague and ambiguous, including but not limited to the term "video-sharing platform." Subject to the foregoing, Google admits this Request.

RFA NO. 3:

Admit that the YouTube site allows users to upload video content to the site.

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