

Exhibit J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NETWORK-1 TECHNOLOGIES, INC.,

Plaintiff,

14 Civ. 2396 (PGG)

- against -

GOOGLE, INC., and YOUTUBE, LLC,

Defendants.

**PLAINTIFF NETWORK-1 TECHNOLOGIES, INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND THINGS FROM DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Network-1 Technologies, Inc. ("Network-1") serves its First Set of Requests for Production of Documents and Things on Defendants Google, Inc. and YouTube, LLC (collectively "Defendants" or "Google"), as follows:

I. INSTRUCTIONS AND DEFINITIONS

A. INSTRUCTIONS

1. Whenever an objection is asserted to a particular request or portion thereof, please produce all responsive documents or parts thereof that are not subject to the objection. Similarly, wherever a document is not produced in full, please state with particularity the reason or reasons it is not being produced in full, and describe, to the best of your knowledge, information and belief and with as much particularity as possible, those portions of the document which are not produced.

II. REQUESTS FOR DOCUMENTS AND THINGS

1. Documents and things relating or referring to any of the patents-in-suit.
2. Documents and things relating or referring to Ingemar J. Cox.
3. Documents and things relating or referring to Network-1.
4. Documents and things relating to any contention that you do not directly infringe the patents-in-suit.
5. Documents and things relating to any of your affirmative defenses and counterclaims.
6. Documents and things relating to any contention that any claim of the patents-in-suit is invalid and/or unenforceable due to double-patenting and/or failure to meet one or more of the conditions of patentability and/or patent eligibility specified in Title 35 of the United States Code, including, without limitation, sections 101, 102, 103, and/or 112.
7. Documents and things relating to any contention that Network-1's claims for relief are barred any equitable doctrines.
8. Documents relating to the level of ordinary skill in the art of the patents-in-suit.
9. Documents relating to alleged prior art to the patents-in-suit.
10. Documents relating to any searches performed by you or on your behalf of patents or other prior art relating to the patents-in-suit, including, but not limited to, enforceability searches, infringement searches, validity searches, and prior art searches.
11. Documents relating to any opinion, request for opinion, evaluation, analysis, investigation, or search relating to the validity, scope, interpretation, construction, enforceability, unenforceability, or the infringement or potential infringement of any of the claims of the patents-in-suit.
12. Documents relating to when you first became aware of the patents-in-suit or any application from which the patents-in-suit issued.

13. Documents relating to any planned, potential, or implemented design-around of any claim of the patents-in-suit, including any documents evidencing the cost and/or effects of any such design-around.

14. Documents relating to your policies or practices, if any, to avoid infringing patents owned by third parties.

15. Documents sufficient to identify all versions of each Accused Instrumentality.

16. Documents sufficient to evidence the conception, design, development, implementation, testing, production or operation of each Accused Instrumentality, including documents relating to research, functional specifications, design specifications, operational specifications, other specifications, or similar documents.

17. Documents related to the conception, design, development, implementation, testing, and operation of each Accused Instrumentality's algorithm or process related to extracting features from media content, including without limitation, any digital "fingerprints," vectors, ID files, or other features used by any Accused Instrumentality in used to match reference files to uploaded content.

18. Documents related to the conception, design, development, implementation, testing, and operation of each Accused Instrumentality's algorithm or process related to comparing reference files to uploaded files using features extracted from media content, including without limitation any algorithm or process used to compare ID files to uploaded content.

19. Source code (*e.g.*, C++, Flash, Java, etc.) for each of the Accused Instrumentalities, including the source code for the functionalities responsible for extracting features from uploaded media content and searching for corresponding reference works in each of the Accused Instrumentalities.

20. Documents sufficient to evidence the manuals, guides, instructions, and product documentation for each Accused Instrumentality.