

Exhibit K

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

NETWORK-1 TECHNOLOGIES, INC.,

Plaintiff,

v.

GOOGLE, INC. and YOUTUBE, LLC,

Defendants.

14 Civ. 2396 (PGG)

14 Civ. 9558 (PGG)

**PLAINTIFF NETWORK-1 TECHNOLOGIES, INC.'S THIRD 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. serves its Third 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.

2. Please produce documents in such a manner as will facilitate their identification with the particular request or category of requests to which they are responsive.

3. The words “and” and “or” shall be construed both conjunctively and disjunctively, and each shall include the other wherever such dual constructions will serve to bring within the

embed a clickable hyperlink on any page displaying video content to an end user (including without limitation the YouTube video-sharing websites <www.youtube.com> and <m.youtube.com>), wherein the hyperlink is selected, generated, or provided based in whole or in part upon a match identified using the ContentID system, or any other system in which extracted features of an uploaded work are compared with a reference media work to identify a match. This term includes, without limitation, the “click-to-buy” and “programming from claimed” features on YouTube.

11. The terms “person” or “persons” mean and include natural persons, corporations, partnerships, limited partnerships, associations, organizations, joint ventures, groups, government bodies or agencies, legal entities, or any other entities.

12. The term “communication” means any oral or written transmission of information between Persons, including but not limited to, meetings, discussions, conversations, telephone calls, memoranda, letters, teletypes, telexes, conferences, or seminars.

II. REQUESTS FOR DOCUMENTS AND THINGS

55. Documents and things relating or referring to U.S. Patent No. 8,904,464.

56. Documents and things relating to any contention that you do not directly infringe U.S. Patent No. 8,904,464.

57. Documents and things relating to any contention that any claim of U.S. Patent No. 8,904,464 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.

58. Documents relating to the level of ordinary skill in the art of U.S. Patent No. 8,904,464.

59. Documents relating to alleged prior art to U.S. Patent No. 8,904,464.

60. Documents relating to any searches performed by you or on your behalf of patents or other prior art relating to U.S. Patent No. 8,904,464, including, but not limited to, enforceability searches, infringement searches, validity searches, and prior art searches.

61. 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 U.S. Patent No. 8,904,464.

62. Documents relating to when you first became aware of U.S. Patent No. 8,904,464 or any application from which U.S. Patent No. 8,904,464 issued.

63. Documents relating to any planned, potential, or implemented design-around of any claim of U.S. Patent No. 8,904,464, including any documents evidencing the cost and/or effects of any such design-around.

64. Documents between or among you and any other person or entity concerning this litigation, U.S. Patent No. 8,904,464, or potential alleged prior art to U.S. Patent No. 8,904,464.

65. Documents sufficient to identify all versions of each Hyperlinking Feature.

66. Documents sufficient to evidence the conception, design, development, implementation, testing, production, and operation of each Hyperlinking Feature, including documents relating to research, functional specifications, design specifications, operational specifications, other specifications, or similar documents.

67. Documents sufficient to evidence the manuals, guides, instructions, and product documentation for each Hyperlinking Feature.

68. Source code (*e.g.*, C++, Flash, Java, etc.) for each Hyperlinking Feature.