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14 Attorneys for Defendant  
GOOGLE INC.

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

19 ORACLE AMERICA, INC.

20 Plaintiff,

21 v.

22 GOOGLE INC.

23 Defendant.

Case No. 3:10-cv-03561-WHA

Honorable Judge William Alsup

**DEFENDANT GOOGLE INC.’S  
RESPONSES TO PLAINTIFF’S  
INTERROGATORIES, SET ONE**

1	Josh Bloch	Google employee - on Dalvik team in 2009.	Contributed to the development of the Android core libraries.
2	Jesse Wilson	Google employee - on Dalvik team from 2009 to present.	Technical lead for the development of the Android core libraries.
3	Elliott Hughes	Google employee - on Dalvik team from 2009 to present.	Contributed to the development of Android core libraries and features of the Dalvik VM.
4	Barry Hayes	Former Google employee - on Dalvik team from 2009 to 2010.	Contributed to the development of the Dalvik garbage collector.
5	Carl Shapiro	Google employee - on Dalvik team from 2009 to present.	Contributed to the development of the Dalvik garbage collector.
6	Jeff Hao	Google employee - on Dalvik team from 2009 to present.	Contributed to the development of the Dalvik JIT compiler, the dx tool and features of the Dalvik VM.
7	Brian Carlstrom	Google employee - on Dalvik team from 2010 to present.	Contributed to the development of the Android core libraries and Dalvik tool.
8	Brad Fitzpatrick	Google employee - on Dalvik team from 2010 to present.	Contributed to the improvement and maintenance of overall system performance of Android.

16 Google further states in response to this Interrogatory that certain third parties contributed  
17 to the development of code for Android, but that the identities of such third parties and the  
18 specific nature of their involvement is subject to contractual confidentiality provisions. Google  
19 is undertaking to obtain the consent of the relevant parties to disclosing additional information,  
20 and reserves the right to supplement this response promptly once such consent is obtained.  
21 Further, Google's investigation into identifying additional third parties (if any) is ongoing, and  
22 Google therefore reserves the right to supplement this response accordingly.

23 **INTERROGATORY NO. 2:**

24 Identify who at Google was and is responsible for Android's compliance with the  
25 intellectual property rights of third parties and briefly describe their roles in that regard.

26 **RESPONSE:**

27 In addition to its General Objections, Google objects to this Interrogatory as vague and  
28 ambiguous in the use of the phrases "compliance," and "intellectual property rights of third

1 parties.” Google further objects to this Interrogatory to the extent it seeks information protected  
2 by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege,  
3 immunity, or protection.

4 Subject to the foregoing objections and the General Objections, without waiver or  
5 limitation thereof, Google states:

6 Dan Bornstein is the Technical Lead for the Dalvik team and is responsible for the review  
7 of code for the Dalvik project. Hiroshi Lockheimer is an Engineering Director for Android and  
8 is responsible for the overall standards of code review for Android. From 2006 to 2009, Steve  
9 Horowitz was an Engineering Director for Android and was responsible for the overall standards  
10 of code review for Android. The Google Open Source Program Office is responsible for the  
11 overall standards of open source code review for Google, including compliance with third party  
12 licenses. Chris DiBona is the Open Source Program Manager.

13 The Android Open Source Project team is responsible for reviewing all external  
14 contributions to Android, as well as for the final review of open source code prior to each public  
15 release of Android. The Android Open Source Project team consists of Dan Morrill and Jean  
16 Baptiste-Queru. Prior to 2008, Chis DiBona and Daniel Berlin were involved in the open source  
17 code review of Android.

18 Jesse Wilson was responsible for collecting the Apache Authorized Contributor  
19 Questionnaires and Individual Contributor License Agreements for contributions to the Android  
20 core libraries.

21 **INTERROGATORY NO. 3:**

22 Please explain the factual and legal bases for Google’s pleading of its first affirmative  
23 defense: No Patent Infringement.

24 **RESPONSE:**

25 In addition to its General Objections, Google objects to this Interrogatory as it seeks  
26 information protected by the attorney-client privilege, the work product doctrine, and/or any  
27 other applicable privilege, immunity, or protection. Google further objects to this Interrogatory  
28 as unduly burdensome as it is not reasonably calculated to lead to the discovery of admissible

1 DATED: January 6, 2011

**KING & SPALDING LLP**

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3 By: /s/ Scott T. Weingaertner

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, January 6, 2011, I served a true and correct copy of  
DEFENDANT GOOGLE INC.'S RESPONSES TO PLAINTIFF'S INTERROGATORIES, SET  
ONE via e-mail on the following individuals:

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Executed on January 6, 2011.

/s/ Steven T. Snyder  
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