Exhibit A

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ORACLE AMERICA, INC., Plaintiff, v. GOOGLE INC., Defendant.	Case No. 3:10-cv-03561-WHA **CORRECTED DECLARATION OF BENJAMIN LEE CONCERNING THE AUGUST 6, 2010 EMAIL AND DRAFTS THEREOF** Judge: Hon. Donna M. Ryu Date Comp. Filed: October 27, 2010 Trial Date: October 31, 2011

I, Benjamin Lee, state:

1. From 2006 through November 2010 I was employed by Defendant Google Inc. ("Google") as an in-house attorney. I was one of the recipients of Tim Lindholm's August 6, 2010 email, which I understand to be the subject of a pending motion to compel filed by Oracle America, Inc. ("Oracle"). At the time I received Mr. Lindholm's email I was Senior Counsel for Google.

2. In November 2010, I left Google for an in-house counsel position at Twitter, where I am currently Legal Counsel.

3. I submit this declaration to provide factual information regarding Mr. Lindholm's role in assisting myself and other Google attorneys in investigating and evaluating Oracle's patent-infringement claims.

4. Except where I have stated facts on information and belief, I have knowledge of the facts set forth herein, and if called to testify as a witness thereto could do so competently under oath.

5. On or about July 20, 2010, I attended a meeting with attorneys for Oracle at Google's office in Mountain View, California. At that meeting, Oracle claimed that Google was infringing on Oracle patents. Oracle threatened to sue Google over those patents.

6. After the July 20, 2010 meeting, I asked Mr. Lindholm to gather certain information related to Oracle's infringement claims. I asked Mr. Lindholm to do this to assist Google's legal analysis of those claims.

7. On or about July 30, 2010, Mr. Lindholm and I attended a meeting convened by Google General Counsel Kent Walker. The purpose of the meeting was to formulate a response to Oracle's infringement claims. Mr. Lindholm provided input on issues related to those claims at the meeting.

8. At the direction of Mr. Walker and myself, Mr. Lindholm continued after the July 30, 2010 meeting to work on issues related to Oracle's infringement claims. I supervised Mr. Lindholm's ongoing efforts and communicated with him several times in late July and early August 2010 to learn the results of those efforts.

9. On or about August 6, 2010, I received an email from Mr. Lindholm regarding the investigation Mr. Walker and I had asked him to conduct. On information and belief, I understand that two copies of this email were listed on Google's privilege log as entries 2551 and 5513 and that one copy of it has been submitted *in camera* to the Court.

10. Mr. Lindholm's August 6, 2010 email addresses some of the Oracle-related topics that Mr. Walker and I asked him to investigate. Mr. Lindholm was acting at my and Mr. Walker's direction when he drafted the August 6, 2010 email.

I declare under penalty of perjury that the foregoing facts are true and correct. Executed on August 17, 2011.

BENJAMIN LEE