EXHIBIT C

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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. CV 10-03561 WHA **ORACLE AMERICA, INC.'S RESPONSES AND OBJECTIONS TO DEFENDANT GOOGLE INC.'S FIRST SET OF REQUESTS FOR PRODUCTION TO PLAINTIFF ORACLE AMERICA, INC. (NOS. 1-65)** Dept.: Courtroom 9, 19th Floor Judge: Honorable William H. Alsup

PROPOUNDING PARTY: Defendant GOOGLE INC.

RESPONDING PARTY: Plaintiff ORACLE AMERICA, INC.

SET NO.: One (Nos. 1-65)

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, Plaintiff Oracle America, Inc. ("Oracle") hereby submits the following responses and objections to Defendant Google Inc.'s ("Google") First Set of Requests for Production of Documents ("Requests").

REQUEST FOR PRODUCTION NO. 1:

All Documents Relating to the Patents-in-Suit or the Claimed Subject Matter of the Patents-in-Suit, including but not limited to all Documents Relating to the prosecution of the Patents-in-Suit and all Documents Relating to the conception, diligence and/or reduction to practice of any invention(s) allegedly claimed in the Patents-in-Suit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Oracle directs Google's attention to Oracle's production pursuant to Patent Local Rule 3-2, which includes documents that relate to the patents in suit and the technology at issue. Oracle will produce additional non-privileged, non attorney work-product documents found in Oracle's possession, custody, or control through reasonable efforts.

Oracle objects to this request on the grounds that "All Documents Relating to" and "the Claimed Subject Matter of the Patents-in-Suit" are vague. Oracle further objects to this request to the extent that it encompasses documents and information protected from discovery by the attorney-client privilege or the attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 2:

All Documents and Things Relating to Related Patents and/or Applications or any Claimed Subject Matter disclosed by any Related Patents and/or Applications, including but not limited to all Documents Relating to the prosecution of Related Patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Oracle has already produced or will produce U.S. and foreign file histories in its possession, custody or control that can be found through reasonable efforts corresponding to:

5,367,685

RE36,204

RE38,104

6,513,156

6,910,205

5,966,702

6,125,447

6,192,476

6,047,377

6,044,467

6,061,520

7,293,267

7,426,720

To the extent Google seeks other documents or things, Oracle objects to this request on the grounds that it is unduly burdensome. Information relating to "Related Patents and/or Applications" is publicly accessible and equally available to Google. Oracle also objects to this request on the grounds that it is not clear exactly what Google seeks because the request does not describe with reasonable particularity each item or category of items to be inspected as required by Federal Rule of Civil Procedure 34(b)(1)(A). As to, *e.g.*, "All Documents and Things Relating to Related Patents and/or Applications," "All Documents and Things Relating to . . . any Claimed Subject Matter disclosed by any Related Patents and/or Applications," and "all Documents Relating to the prosecution of Related Patents," Oracle objects to this request as vague and overbroad. Oracle further objects to this request to the extent that it encompasses documents and information protected from discovery by the attorney-client privilege or the attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 3:

All Documents and Things Relating to any licenses, assignments of, grants of rights to, covenants not to sue for infringement of, or requests for or negotiations regarding any license of, assignment of, grant of rights to, or covenant not to sue for infringement of, the Patents-in-Suit,

any Related Patents and/or Applications, or the Claimed Subject Matter disclosed in the Patents-in- Suit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Oracle will produce licenses, assignments, grants of rights to, covenants not to sue for infringement of the asserted patents that can be found in its possession, custody, or control through reasonable efforts. Oracle directs Google to documents evidencing ownership of the patent rights at OAGOOGLE0000053760-53792 and OAGOOGLE0000056022-56028.

To the extent Google seeks other documents or things, Oracle objects to this request on the grounds that it is not clear exactly what Google seeks because the request does not describe with reasonable particularity each item or category of items to be inspected as required by Federal Rule of Civil Procedure 34(b)(1)(A). As for "all documents and things relating to" such documents, Oracle objects to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. Oracle further objects to this request to the extent that it would encompass documents and information protected from discovery by the attorney-client privilege or the attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 4:

Documents and Things sufficient to Identify every device, system, or product that is or was marked (by Sun, by Oracle or by any other person) with the patent number of any of the Patents-in-Suit or any Related Patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Oracle is not aware of any device, system, or product expressly marked with the patent number of any of the Patents-in-Suit or any Related Patents as defined in Oracle's response to Google's request for production no. 2.

REQUEST FOR PRODUCTION NO. 5:

All Documents and Things on which Oracle relies in support of its belief, allegation, or contention of infringement of the Patents-in-Suit by Google, including all Documents concerning any opinions, studies, review, analysis, or investigation done at any time regarding whether any claims of the Patents-in-Suit are being or have been infringed by Google, and all documents

encompass documents and information protected from discovery by the attorney-client privilege or the attorney work-product doctrine.

Dated: January 6, 2011

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