

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

**PLAINTIFF'S INTERROGATORIES
TO DEFENDANT GOOGLE INC.,
SET FOUR**

Dept.: Courtroom 9, 19th Floor
Judge: Honorable William H. Alsup

1 PROPOUNDING PARTY: PLAINTIFF ORACLE AMERICA, INC.

2 RESPONDING PARTY: DEFENDANT GOOGLE, INC.

3 SET: FOUR (Nos. 20-25)

4 In accordance with Federal Rule of Civil Procedure 33, Plaintiff Oracle America, Inc.
5 (“Oracle”) hereby propounds the following interrogatories to Defendant Google Inc. (“Google”),
6 to be answered in writing within 30 days from service.

7 DEFINITIONS AND INSTRUCTIONS

8 As used below, the following terms have the meanings indicated:

9 1. “Java Platform” refers to the Java programming language, the Java compiler, the
10 Java Virtual Machine, the Java Development Kit, the Java Runtime Environment, the Just-In-
11 Time compiler, Java class libraries, Java application programming interfaces, and Java
12 specifications and reference implementations.

13 2. “Android” means “the Android Platform” and “Android” as referred to in
14 Google’s Answer (Docket No. 32) at Background ¶ 12 and in Google’s Answer to Amended
15 Complaint (Docket No. 51) at Background ¶ 12 and at Factual Background ¶¶ 11–17, and
16 includes any versions thereof (whether released or unreleased) and related public or proprietary
17 source code, executable code, and documentation.

18 3. “Google” or “You” means Google Inc. and any companies that Google Inc. has
19 acquired, including Android, Inc. In directing these interrogatories to Google, we seek all
20 information available to Google, including information relating to companies Google has
21 acquired (such as Android, Inc.).

22 INTERROGATORIES

23 **INTERROGATORY NO. 20:**

24 Identify and describe in detail any non-infringing alternatives to the Android technologies
25 alleged to infringe the patents-in-suit and copyrights-in-suit considered by or available to Google
26 from the time Google began to develop Android up to and including the release of version 2.2
27 (“Froyo”), including Google’s basis for rejecting each identified alternative.
28

INTERROGATORY NO. 21:

Identify and describe in detail each modification made by third parties to the allegedly-infringing portions of Android source code and documentation identified by Oracle's copyright and patent infringement contentions, including the author of, date of, and basis for each such modification.

INTERROGATORY NO. 22:

Describe in detail the steps that Google and Android device manufacturers perform to retrieve, port, load, install, test, and/or execute Android on Android devices, including without limitation the person or entity that performs each step and the physical location where each step is performed.

INTERROGATORY NO. 23:

Please state the total amount of projected and actual advertising revenue from Android devices (separately for phones and for other devices) that Google projected it would earn or has earned in the United States separately for each month from November 2007 through December 2013.

INTERROGATORY NO. 24:


Identify and describe in detail all ways in which Google has reduced or expects to reduce the amount of revenue sharing with third parties in connection with Android, including without limitation the total amount of reduced revenue sharing that Google anticipated as of October 2007 and October 2008 in connection with Android.

INTERROGATORY NO. 25:

Identify (by production number, date, and author for any documents) and describe in detail the basis for and materials considered in deriving all mobile revenue, profit, and unit projections (written or otherwise) made from July 2005 through December 2008, broken out by Android and non-Android revenue, profit, and unit projections.

1 Dated: June 29, 2011

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4 By: Daniel Muino 
Daniel P. Muino

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