

# **EXHIBIT 44**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE AUTHORS GUILD, INC., et al,	:	
	:	Index No. 11 Civ. 6351 (HB)
Plaintiffs,	:	
	:	
- against -	:	
	:	
HATHITRUST, et al.	:	
	:	
Defendants.	:	
-----X		

**OBJECTIONS AND RESPONSES OF PLAINTIFF FAY WELDON  
TO DEFENDANTS’ FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Plaintiff Fay Weldon (“Plaintiff”) hereby submits, pursuant to Rules 26, 34 and 36 of the Federal Rules of Civil Procedure and Rules 26.3 and 33.3 of the Local Rules for the United States District Courts for the Southern Districts of New York (the “Local Rules”), Plaintiff’s objections and responses to Defendants’ First Set of Interrogatories and Requests for the Production of Documents (“Requests”).

**GENERAL STATEMENTS**

A. Plaintiff incorporates by reference each and every General Objection set forth below into each and every specific response. From time to time a specific response may restate a General Objection for emphasis or some other reason. The failure to include any General

Objection in any specific response shall not constitute a waiver of any General Objection with respect to that request.

B. No incidental or implied admissions are intended by the responses herein. That Plaintiff has answered or objected to any interrogatory or document request should not be taken as an admission that Plaintiff accepts or admits the existence of any fact set forth or assumed by such interrogatory or document request. The fact that Plaintiff has answered part or all of any interrogatory or document request is not intended to be, and shall not be construed to be, a waiver by Plaintiff of any part of any objection to that interrogatory or document request.

C. These responses are made solely for the purpose of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any grounds that would require the exclusion of any documents produced or information provided by Plaintiff at time of trial. By responding to Defendants' interrogatories or document requests, Plaintiff does not waive any objection that may be applicable to: (1) the use, for any purpose, by Defendant of any documents, things or information provided in response to Defendants' interrogatories or document requests; or (2) the admissibility, privilege, relevancy, authenticity, or materiality of any of such documents, things or information to any issue in the case. Plaintiffs expressly reserves the right to object to the use of documents or things produced, or information provided, in connection herewith during any subsequent proceeding, including the trial of this or any other action.

D. Plaintiff has not completed an investigation of all of the facts relating to this case, has not completed discovery in this action, and has not completed Plaintiff's preparation for trial. The documents and things produced, or information provided, in response to Defendants' interrogatories or document requests are without prejudice to Plaintiff's rights to produce

additional documents and things, or provide further information. Plaintiff's responses to Defendants' interrogatories and document requests are made based on Plaintiff's present information and belief predicated upon information and writings presently available to and located by Plaintiff and Plaintiff's attorneys. Accordingly, these responses are subject to supplementation and amendment should future investigation indicate that to be appropriate. Plaintiff also reserve the right to produce or use any documents or information produced and/or discovered after service of this response in support of or in opposition to any motion, in depositions, or at trial.

### **GENERAL OBJECTIONS**

A. Plaintiff objects to each of the requests seeking confidential, trade secret, or proprietary business, technical, marketing, or financial information, or any other confidential material. Plaintiff will disclose confidential information only pursuant to the terms of the Stipulated Protective Order entered or to be entered in this case. These responses are designated "CONFIDENTIAL" under the Protective Order entered in this case.

B. Plaintiff objects to each of the requests seeking information covered by the attorney-client privilege, work product immunity, joint defense privilege, or otherwise covered by any other applicable privilege, immunity, or other protection.

C. Plaintiff objects to each of the requests to the extent it seeks documents or information that are already in Defendants' possession, are a matter of public record, or are otherwise equally available to Defendants.

D. Plaintiff objects to each of the requests with respect to which any benefit of the production to Defendants is outweighed by the burden and expense to Plaintiff, taking into account the needs of the case.

E. Plaintiff objects to each of the requests seeking through definitions and instructions to impose obligations beyond what is required in accordance with the Federal Rules of Civil Procedure, the Local Rules, applicable court orders, or stipulations or agreements of the parties (collectively, “the Rules”). Plaintiff will respond to Defendants’ requests only to the extent required by the Rules.

F. Plaintiff objects to each of the requests seeking material that Plaintiff is under an obligation to any third-party not to disclose, including documents that would require breach of a contract, protective order, settlement, or other duty to maintain confidentiality.

G. Plaintiff objects to each of the requests seeking the same information requested by one or more of Defendants’ requests for production or any interrogatory served by Defendants at any time in this case. Plaintiff will provide information or documents only once, regardless of the number of requests to which the same may be responsive.

H. Plaintiff objects to each of the requests to the extent that it seeks information not relevant to any claim or defense and/or not reasonably calculated to lead to the discovery of admissible evidence, including but not limited to, information beyond the relevant temporal and/or geographic scope of this matter.

I. Plaintiff objects to each of the requests that purports to attribute any special or unusual meaning to any technical terms or phrases.

J. Plaintiff objects to each of the requests, and to the incorporated definitions and instructions contained in such request, that purports to alter the plain meaning and/or scope of any specific request and thereby renders such request vague, ambiguous, overbroad, or uncertain.

K. Plaintiff objects to each of the requests as overbroad and unduly burdensome to the extent that it can be interpreted in such a way as to require Plaintiff to search for documents beyond Plaintiff's possession, custody, or control.

L. Plaintiffs object to each of the requests to the extent they seek legal opinions that are not properly the subject of rule 26 discovery.

**SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES**

*1. Identify each work for you are the legal or beneficial owner of a copyright or an exclusive right under a copyright that you claim has been infringed by one or more of the Defendants, and provide the following information for each such work: (i) title; (ii) author; (iii) date and location of first publication; (iv) date and location of any subsequent publication; (v) the date and registration number of any U.S. copyright registration and/or renewals; and, if applicable, (vi) the specific exclusive right for which you are the legal or beneficial owner; (vii) the manner in which you became the legal or beneficial owner of that exclusive right; and (viii) any other person or entity, including without limitation co-authors or publishers, that is also a legal or beneficial owner of a copyright or an exclusive right under a copyright for that work, and identify any specific exclusive right for which that person or entity is the legal or beneficial owner.*

**RESPONSE:**

Plaintiff objects to this interrogatory on the ground that it seeks information beyond the scope of discovery in this action, including without limitation, that the date and location of every publication of each work infringed by Defendants, as well as the information requested in subparagraphs (vi) through (viii) above, are not necessary to establish either Plaintiff's (a) legal or beneficial ownership of the copyright at issue, or (b) standing to bring a claim against Defendants arising from their infringement of Plaintiff's copyright. Moreover, the aforementioned requests are both overbroad and unduly burdensome.

Subject to and without waiving any of the foregoing objections or the General Objections, Plaintiff's response to this interrogatory, which is provided to the best of Plaintiff's knowledge, is set forth in Schedule A.

2. *For each work identified in response to Interrogatory No. 1, identify the most recent date on which that work was published, in hardcopy or electronic form, for distribution and commercial sale.*

**RESPONSE:**

Subject to and without waiving any General Objections, Plaintiff's response to this interrogatory, which is provided to the best of Plaintiff's knowledge, is set forth in Schedule A.

3. *For each work identified in response to Interrogatory No. 1: (i) indicate whether any copyright in the work, or any exclusive right under a copyright in the work, was previously licensed, transferred or assigned to any person and has since reverted to you; and, if applicable, (ii) identify the specific exclusive right that has so reverted.*

**RESPONSE:**

Plaintiff objects to this interrogatory on the ground that it seeks information beyond the scope of discovery in this action, including without limitation, that the information requested is not necessary to establish either Plaintiff's (a) legal or beneficial ownership of the copyright at issue, or (b) standing to bring a claim against Defendants arising from their infringement of Plaintiff's copyright. Moreover, the interrogatory is both overbroad and unduly burdensome.

Subject to and without waiving any of the foregoing objections or the General Objections, Plaintiff states that for each of Plaintiff's works identified on Schedule A, Plaintiff granted the exclusive right to publish the work to one or more publishers for a period of time in exchange for the payment of royalties. Irrespective of whether those rights reverted, at all times, Plaintiff was and continues to be either the legal or beneficial owner of the exclusive rights to reproduce and distribute the work, which are the exclusive rights Plaintiff claims to have been violated by Defendants in this action.

4. *For each work identified in response to Interrogatory No. 1, identify any license or other agreement permitting or requiring the digitization of the work for any purpose — including without limitation for use in digital distribution, in an electronic database, for archiving or preservation purposes, for non-consumptive research, for full-text searching,*

*and/or for use in formats accessible by the blind or others with print disabilities—as well as any documents concerning such license or agreement.*

**RESPONSE:**

Plaintiff objects to this interrogatory on the ground that it seeks information beyond the scope of discovery in this action, including without limitation, that publishing licenses and agreements may be ambiguous as to whether digital reproduction and distribution rights are covered by the grant of rights, and neither Plaintiff's claims nor Defendants' defenses in this action require the resolution of any such ambiguity.

Subject to and without waiving any of the foregoing objections or the General Objections, for each of Plaintiff's works identified on Schedule A, Plaintiff will conduct a reasonable search and produce any licenses or other agreements in Plaintiff's possession, custody or control that expressly grant the counterparty to the agreement the right to digitize for any purpose.

5. *For each work identified in response to Interrogatory No. 1, identify any past, present, or planned efforts made by you directly, or made by others on your behalf or with your knowledge, to enter any license or other agreement allowing for the digitization of the work for any purpose—including without limitation for use in digital distribution, in an electronic database, for archiving or preservation purposes, for non-consumptive research, for full-text searching, and/or for use in formats accessible by the blind or others with print disabilities—as well as any documents concerning such efforts.*

**RESPONSE:**

Subject to and without waiving any General Objections, for each of Plaintiff's works identified on Schedule A, Plaintiff will conduct a reasonable search and produce any documents concerning any specific past, present or planned efforts made by Plaintiff, or made by others on Plaintiff's behalf or with Plaintiff's knowledge, to enter into a license or other agreement allowing for the digitization of the work for any purpose. In addition, Plaintiff has, is and will



continue to consider pursuing licenses or agreements to digitize and distribute in digital form Plaintiff's works that to date have only been published in paper form.

6. *For each work identified in response to Interrogatory No. 1, identify any harm that has occurred or is expected to occur to any market or potential market for that work by virtue of Defendants' alleged conduct described in the First Amended Complaint, including without limitation the identification of (i) the market or potential market at issue (by name and/or brief description); (ii) any licensee or potential licensee of the work within that market; and (iii) all documents concerning the alleged harm that has occurred or is expected to occur.*

**RESPONSE:**

Plaintiff objects to this interrogatory on the ground that it seeks information beyond the scope of the parties' agreement concerning the appropriate use of interrogatories in this action.

Plaintiff further objects to this interrogatory on the ground that Plaintiff does not seek actual damages in this action, but an injunction under 17 U.S.C. § 502 and impoundment under 17 U.S.C. § 503, for which it is not necessary to quantify monetary damages.

Subject to and without waiving the foregoing objections or any General Objections, Plaintiff states that the "alleged conduct described in the First Amended Complaint," that is, the digitization of Plaintiff's copyrighted content, the repeated copying and transferring of the digital files resulting from that digitization to multiple physical and virtual locations, including on computer systems connected to the Internet, without Plaintiff's permission, in violation of section 501 of the Copyright Act, has caused Plaintiff damages that are unquantifiable and irreparable. Plaintiff asserts that those damages comprise, among other things:

- Loss or potential loss of control over the reproduction and distribution of Plaintiff's copyrighted works;
- Exposure of Plaintiff's copyrighted works to virtually unlimited piracy;
- Loss or potential loss of revenue from sale of hardcopies and digital copies of works to libraries; and

- Loss or potential loss of revenue from licensing digital copies of works to libraries.

Plaintiff has to date not been able to quantify any specific revenues lost as a result of Defendants' infringing conduct and Plaintiff is not aware of any documents in Plaintiff's possession, custody or control that could be employed to quantify any specific damages incurred as a result of Defendants' infringing conduct.

7. *For each work identified in response to Interrogatory No. 1, identify any reduction to the value or potential value of that work by virtue of Defendants' alleged conduct described in the First Amended Complaint, including without limitation the identification of (i) the decline in value, measured in dollars, of each such work; and (ii) all documents and other evidence that support the alleged decline in value.*

**RESPONSE:**

Plaintiff repeats and restates Plaintiff's objections and response to Interrogatory No. 6.

**SPECIFIC OBJECTIONS AND RESPONSES TO DOCUMENT REQUEST**

1. *All documents identified by you in response to Defendants' First Set of Interrogatories to Plaintiff.*

**RESPONSE:**

Subject to and without waiving any General Objections or other objections as set forth herein, Plaintiff will conduct a reasonable search and produce any documents in Plaintiff's possession, custody or control identified as responsive to Interrogatory Nos. 4 or 5 above.

Dated: New York, New York  
January 12, 2012

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**SCHEDULE A**

<b>AUTHOR</b>	<b>TITLE</b>	<b>FIRST PUBLICATION</b>	<b>SUBSEQUENT PUB(S).</b>	<b>MOST RECENT PUB. HARDCOPY OR ELECTRONIC?</b>	<b>U.S. COPYRIGHT REGISTRATIONS OR RENEWALS</b>
Weldon, Fay	A hard time to be a father: a collection of short stories	1998-12-07/London: Flamingo (HarperCollins)	January 1999/New York: Bloomsbury 2000/New York: Bloomsbury	Hardcopy	N/A – Foreign Work
Weldon, Fay	Affliction	1993/London: HarperCollins	1993-10-19/New York: Penguin Books (under title “Trouble”) 1994-10-01/New York: Penguin Books	Hardcopy	TX0003682496 1993-12-13
Weldon, Fay	Auto da fay	2001-12-31/New York: Grove Press (electronic)	2002-06-24/London: Flamingo May 2003/New York: Grove Press June-2004/New York: Grove Press 2011-06-30/ London: Flamingo	Electronic	TX0005741087 2003-05-30
Weldon, Fay	Big women	1997-11-10/London: Flamingo (HarperCollins)	1997/Canada (under title “Big Girls Don't Cry”) 1998/New York: Grove Press/Atlantic Monthly Press (under	Electronic	TX0004843655 1998-09-09, supplemented by TX0004943195 1999-04-15

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			title "Big Girls Don't Cry") July 1998/London: Flamingo (HarperCollins) 1999-01-01/London: Harper Collins 1999-09-02/ Atlantic Monthly Press (under title "Big Girls Don't Cry") 2007-12-01/ Atlantic Monthly Press		
Weldon, Fay	Darcy's utopia	1990-09-20/London: Collins	1991/New York: Viking 1992-07-01/New York: Penguin June 1993/Oxford: Isis Audio	Audio	TX0002931605 1990-10-11
Weldon, Fay	Flood warning: a play	2003-07-22/London: Samuel French		Hardcopy	PA0001247989 2003-08-15
Weldon, Fay	Godless in Eden: a book of essays	1999-09-20//London: Flamingo (HarperCollins)	2000/Canada: Limited	Hardcopy	N/A – Foreign Work
Weldon, Fay	Growing rich	1992-02-20/London: Flamingo		Hardcopy	N/A – Foreign Work

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
		(HarperCollins)			
Weldon, Fay	Leader of the band	1988-07-07/London: Hodder & Stoughton	1989-06-19/New York: Viking 1990-11-01/ New York: Viking	Hardcopy	TX0002560295 1989-05-09
Weldon, Fay	Life force	1992/London: HarperCollins	1992-02-03/New York: Viking 1993-02-01/New York: Viking 1994/London: HarperCollins October 1994/Oxford: Isis Audio	Audio	TX0003274167 1992-03-18
Weldon, Fay	Little sisters	1977/Bath: Chivers Press	1977/New York: Random House. (under title "Words of Advice") 1978-06-12 / New York: Random House. (under title "Words of Advice") 1978, Hodder & Stoughton 1985-09-12/ New York: Random House.	Hardcopy	N/A – Foreign Work

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			(under title "Words of Advice") 1987-12-01/Coronet Books/Hodder & Stoughton		
Weldon, Fay	Mantrapped	2004/London: Fourth Estate (an imprint of HarperCollins)	2004-09-06/New York: Grove Press (electronic) 2005-10-04/ New York: Grove Press November 2005/ Sound Library Audio 2011-06-30/New York: HarperPerennial	Electronic	N/A – Foreign Work
Weldon, Fay	Moon over Minneapolis, or, Why she couldn't stay	1991-01-02/ London: HarperCollins	1992-02-01/New York: Penguin Books 1996-08-01/London: Flamingo	Hardcopy	TX0003114513 1991-07-26
Weldon, Fay	Nothing to wear and nowhere to hide: stories	2002-09-16/London: Flamingo	2003-09-15/London: Flamingo 2011-06-30/London: Flamingo	Electronic	N/A – Foreign Work
Weldon, Fay	Praxis: a novel	1978/London: Hodder and Stoughton	1978-10-11/New York: Summit Books	Hardcopy	TX0000161661 1978-11-20

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			1990-11-01/New York: Penguin Books		
Weldon, Fay	Puffball: a novel	1980-02-01/London: Hodder & Stoughton	1980-07-21/New York: Summit Books 1985-06-01/New York: Pocket Books 1987-12-01/London: Sceptre 1990/London: Coronet Books 1990-03-01/New York: Penguin Books 1994/London: Sceptre 2011-06-30/London: Flamingo	Electronic	TX0000550383 1980-09-22
Weldon, Fay	Remember me	1976/London: Hodder & Stoughton	1976 /New York: Random House 1976/New York: Ballantine 1978/New York: Random House 1981/ London: Coronet Books 1988/ London: Sceptre	Hardcopy	N/A – Foreign Work



AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			1990/London: Hodder & Stoughton 1994 London: Sceptre 2003-06-16/London: Flamingo		
Weldon, Fay	Rhode Island blues	2000/London: Flamingo	2000/New York: Atlantic Monthly Press 2001/North Kingstown: Chivers Press 2002-02-09/New York: Grove Press January 2001/Waterville: Thorndike Press 2007-12-01/ New York: Grove Press 2011-06-30/London: Flamingo	Electronic	TX0005335279 2001-04-26
Weldon, Fay	Sacred cows	1989/London: Chatto & Windus	October 1990/London: Chatto & Windus	Hardcopy	N/A – Foreign Work
Weldon, Fay	She may not leave	2005-12-01/London: Fourth Estate	2005/New York: Grove Press	Electronic	TX0006444289 2006-06-20

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			2006-05-11/New York: Atlantic Monthly 2006/New York: Harper & Row 2007/New York: Harper Collins 2007-12-01/New York: Grove Press 2011-06-30/ London: Fourth Estate		
Weldon, Fay	Splitting	1995/London: Flamingo	1995/New York: Atlantic Monthly 1996-05-01/New York: Atlantic Monthly 1997-12-01/New York: Atlantic Monthly 2007-12-01/New York: Atlantic Monthly	Electronic	TX0004084784 1995-07-07
Weldon, Fay	The Bulgari connection	2001, c2000/London: Flamingo	2001/New York: Atlantic Monthly 2001-10-01:New	Electronic	N/A – Foreign Work

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			York: Grove Press January 2002/Waterville: Thorndike Press January 2002/North Kingstown: Chivers 2005-01-01/Hamburg: Hoffman & Campe 2002-09-12/New York: Grove 2007-12-01/New York: Grove/Atlantic, Inc. 2011-06-30/ London: Flamingo		
Weldon, Fay	The cloning of Joanna May	1989/London: Collins	1989-05-04/New York: Penguin Books 1990-03-26/New York: Viking 1993/London: Flamingo June 1993/Oxford: Isis Audio 1996/02/19/London:	Hardcopy	TX0002728206 1990-01-16

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			Harper Collins		
Weldon, Fay	The fat woman's joke	1967/United Kingdom: MacGibbon & Kee	1968/U.S.: David MacKay Company, Inc. (under title "...and the wife ran away") 1981/ London: Hodder & Stoughton 1982/ London: Coronet Books 1986, c1987/Chicago, IL: Academy Chicago 1993/London: Flamingo 2003/London: Flamingo	Hardcopy	N/A – Foreign Work
Weldon, Fay	The heart of the country	1987/London: Hutchinson	1987-02-05/New York: Viking 1988-01-21/Chicago: Trafalgar Square 1988-11-14/New York: Viking 1988-12-06 North Kingstown: Chivers	Hardcopy	TX0002580673 1988-12-15

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			1990-03-01/New York: Penguin 1992-02-19/ New York: Random House 1992/New York: Vintage 1995-08-14/New York: Vintage		
Weldon, Fay	The hearts and lives of men	1987-09-07/London: Heinemann	1987/New York: Viking 1988/New York: Viking 1990-02-06/ New York: Random House 1992/ London: Flamingo 1997/London: Heinemann	Hardcopy	TX0002176563 1987-10-01
Weldon, Fay	The rules of life	1987/London: Hutchinson	1987-06-03/New York: Harper & Row 1988/New York: Vintage	Hardcopy	TX0002139543 1987-08-20
Weldon, Fay	The Shrapnel Academy	1986/London: Hodder & Stoughton	1986-07-07/New York: Viking	Hardcopy	TX0001967142 1986-12-23

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			1987/London: Coronet Books 1988-04-01/New York: Penguin 1988/London: Coronet Books 1989/New York: Viking February 1989/ Waterville: Thorndike Press 1994/London: Sceptre		
Weldon, Fay	The spa decameron	2007-09-15/London: Quercus	2009-02-03/New York: Grove Press (under title "The Spa") 2008-02-18/New York: Grove Press 2008-02-18/New York: Grove Press 2009-02-03/ New York: Grove Press	Hardcopy	TX0007138911 2010-01-20
Weldon, Fay	Watching me, watching you	1981/London:Hodder & Stoughton	1981-11-11/New York: Summit Books 1981-11-23/ New	Electronic	TX0000907715 1981-12-24

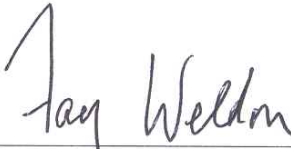
AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			York: Simon & Schuster 1982/ London: Coronet Books 1983-10-27/ North Kingstown: Chivers Press 1988-11-01/ London: Coronet Books 1988/London: Sceptre 1993-05-06/London: Sceptre 2003-07-21/London: Flamingo 2011-06-30/ London: Flamingo		
Weldon, Fay	Wicked women: stories	1995-12-04 /London: Flamingo	1995-12-04/New York: Atlantic Monthly (electronic) 1996/London: Flamingo 1997-06-23/New York: Atlantic Monthly Press	Hardcopy	TX0004578645 1997-07-14

AUTHOR	TITLE	FIRST PUBLICATION	SUBSEQUENT PUB(S).	MOST RECENT PUB. HARDCOPY OR ELECTRONIC?	U.S. COPYRIGHT REGISTRATIONS OR RENEWALS
			1997/New York: Atlantic Monthly Press 1999-01-08/New York: Atlantic Monthly Press		
Weldon, Fay	Worst fears	1996/London: Flamingo	1996-06-20/New York: Atlantic Monthly Press 1996-05-31/New York: Atlantic Monthly 1997-05-07/New York: Atlantic Monthly 1997/London: Flamingo 1998/London: Flamingo 2000/New York: Atlantic Monthly 2007-12-01/New York: Atlantic Monthly	Electronic	TX0004405886 1996-08-30



VERIFICATION

I, Fay Weldon, have read the foregoing Responses to Interrogatory Numbers 1 through 7 and know their contents. The responses provided therein are true to my knowledge, and as to those matters stated upon information and belief, I believe them to be true. I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 12, 2012.

  
\_\_\_\_\_  
Fay Weldon