

EXHIBIT 71

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, INC., ET AL.,

Plaintiffs,

v.

HATHITRUST, ET AL.,

Defendants.

Case No. 11 Civ. 6351 (HB)

**RESPONSES TO PLAINTIFFS'
FIRST SET OF
INTERROGATORIES
TO DEFENDANT HATHITRUST**

Because, as stated below, HathiTrust is not a separate entity capable of being sued or responding to discovery requests, Defendant Mary Sue Coleman (“Defendant”), in her official capacity as President of The University of Michigan (“UM”) and who has the authority to control the HathiTrust Service and the shared repository of digital collections of institutions participating in the HathiTrust Service (the “HathiTrust Digital Library” or “HDL”), states the following objections and responses to Plaintiffs’ First Set of Interrogatories to Defendant HathiTrust pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“FRCP”) and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Rules”) and based upon information provided to her by employees of UM with personal knowledge of the relevant facts.

A. GENERAL OBJECTIONS AND LIMITATIONS

1. Defendant objects to the Interrogatories in their entirety and to each Interrogatory on the ground that HathiTrust is the name of a service provided by UM under agreements with member institutions (the “HathiTrust Service”) and is not a separate entity capable of being sued or responding to discovery requests.

2. Defendant’s discovery and investigation of the facts of this proceeding are continuing. These Interrogatory responses are based on information gathered as of the date of these responses. Defendant reserves the right to amend or supplement her responses when and if additional information is obtained, as required by the FRCP or the Local Rules.

3. Defendant objects to each of Plaintiffs’ definitions and instructions to the extent they impose burdens and requirements on Defendant that are inconsistent with or beyond those set forth in the FRCP or the Local Rules.

4. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent they impose burdens and requirements on Defendant that are inconsistent with or beyond those set forth in the FRCP.

5. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that the information sought is protected from disclosure by (a) agreements with other parties, including, but not limited to, confidentiality agreements, (b) court order, or (c) statute, regulation, administrative order or case law.

6. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that the information sought is commercially sensitive proprietary and/or confidential information and trade secrets (“Confidential Information”). Defendant will provide non-privileged, responsive Confidential Information only pursuant to the Protective Order in place in this litigation.

7. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that the information sought was prepared in anticipation of litigation, constitutes attorney work product, discloses mental impressions, conclusions, opinions, or legal theories of Defendant’s attorneys, contains privileged attorney-client communications (including but not limited to those subject to the common interest or joint defense privilege) or is otherwise protected from disclosure under applicable privileges, law, or rules, or because such information is not properly discoverable under the FRCP or the Local Rules. Any disclosure of such protected or privileged information in any response is inadvertent and shall not constitute a waiver of such privilege, protection or immunity.

8. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that the information sought is (a) not in Defendant’s or UM’s possession, custody,

or control, (b) in the possession, custody, or control of Plaintiffs, (c) publicly available, or (d) as equally available and/or readily accessible to Plaintiffs as it is to Defendant. These interrogatory responses are based on a reasonably diligent search for and review of information in those areas within Defendant's or UM's direct knowledge, custody, or control where information of the type requested would be expected to be found, and Defendant disclaims any obligation to solicit information from any other parties in responding to the Interrogatories.

9. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent they are vague, ambiguous, and/or contain terms that are undefined or otherwise unclear.

10. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that the information sought is irrelevant to the subject matter of this action and to the extent that the Interrogatories are not reasonably calculated to lead to the discovery of admissible evidence.

11. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent that they prematurely call for the disclosure of information that Defendant may obtain through discovery.

12. Defendant objects to the Interrogatories in their entirety and to each Interrogatory insofar as they assume disputed facts or legal conclusions. To the extent any interrogatory assumes disputed facts or legal conclusions, Defendant denies such disputed facts or legal conclusions. Any response or objection by Defendant with respect to any such Interrogatory is without prejudice to this objection and Defendant's right to dispute facts and legal conclusions assumed by the Interrogatories.

13. No objection or limitation, or lack thereof, made in these responses and objections shall be deemed an admission by Defendant as to the existence or nonexistence of information.

14. Defendant's responses to the Interrogatories are made without prejudice to the assertion of additional objections and responses by her at a later date or to Defendant's right to supplement, modify, or amend her responses as appropriate, and to rely upon and produce evidence during trial or at any other proceeding that may be held in this action.

15. Defendant reserves the right to object on any ground at any time to a demand for further response, and reserves the right to revise, supplement, correct, or add to these responses. Defendant expressly reserves any and all rights and privileges under the FRCP, the Local Rules, and any other law or rule, and the failure to assert such rights and privileges shall not constitute a waiver thereof, either with respect to these responses or with respect to any future discovery responses or objections.

16. Defendant incorporates by reference these General Objections into each of the Responses and Specific Objections set forth below, as if fully set forth in each of them.

B. SPECIFIC OBJECTIONS AND LIMITATIONS

DEFINITIONS

1. Defendant objects to Plaintiffs' definition of "University" as overly broad and unduly burdensome in that it includes "each of its subsidiaries, divisions and affiliates, principals, officers, directors, members, employees, agents and attorneys," which refers to thousands of individuals, the vast majority of which have no knowledge of and have had no involvement in the activities that are the subject of Plaintiffs' claims in this action.

2. Defendant objects to Plaintiffs' definition of "digital copy" and to each Interrogatory including that term as vague and ambiguous in Plaintiffs' define a "digital copy" of

a Work as “a copy of all or substantially all of the Master Print Copy” without defining “Master Print Copy.” As relied upon for the definition of “digital copy” as used in the Interrogatories, Defendant understands “Master Print Copy” to refer to a print copy of a Work purchased or otherwise acquired through lawful means by UM.

3. Defendant objects to Plaintiffs’ definition of “HathiTrust Digital Copies” and to each Interrogatory including that term as vague and ambiguous in that Plaintiffs’ definition of “HathiTrust Digital Copies” incorporates and relies upon Plaintiffs’ definition of “digital copy,” which is itself vague and ambiguous as described above in Paragraph B.2. Defendant further states that four “HathiTrust Digital Copies” are maintained to store and preserve the digitized works in the HDL: (1) the “Initial HathiTrust Digital Copy” received from Google and incorporated into the HDL at UM, (2) the “Mirror Site HathiTrust Digital Copy,” (3) the “First Backup Tape HathiTrust Digital Copy,” and (4) the “Second Backup Tape HathiTrust Digital Copy.”

4. Defendant objects to Plaintiffs’ definition of “Third Party Digital Copies” and to each Interrogatory including that term as vague and ambiguous in that Plaintiffs’ definition of “Third Party Digital Copies” incorporates and relies upon Plaintiffs’ definition of “digital copy,” which is itself vague and ambiguous as described in Paragraph B.2.

INSTRUCTIONS

5. Defendant objects to Paragraph 1 of Plaintiffs’ “Instructions” on the ground that it impermissibly seeks to impose burdens and requirements beyond those set forth in the FRCP 26 and 33 by requiring responses to the Interrogatories based upon the knowledge of, and information available to, parties other than the party upon which the Interrogatories are served. Defendant further objects to this definition because it could potentially refer to thousands of

individuals, the vast majority of which have no knowledge of and have had no involvement in the activities that are the subject of Plaintiffs' claims in this action, and in this regard is overly broad, unduly burdensome, seeks irrelevant information and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSES TO INTERROGATORIES

1. Identify the total number of digital copies of works held by HathiTrust and the estimated number of those works that are protected by copyright under the United States Copyright Act.

RESPONSE: Defendant objects to Interrogatory No. 1 on the ground that it is vague and ambiguous in that it requests information that may change on a periodic basis without specifying the time or time period for which the information is sought. Subject to the foregoing general and specific objections, and without waiving the same, Defendant responds that as of January 17, 2012, there are over 10,000,000 digitized volumes in the HathiTrust Digital Library ("HDL"), the shared repository of digital collections of institutions participating in the HathiTrust Service. UM's library does not currently have an estimate of the number of works in the HDL that are protected by copyright under the United States Copyright Act, as UM's efforts to determine the copyright status of works in the HDL are ongoing.

2. For each Work listed on Schedule A, provide the following information with regard to the HathiTrust Digital Copies and Third Party Digital Copies of the Work:

- (a) the title and author of the Work;
- (b) the date the digital copy was created;
- (c) the identity of the source of the digital copy;
- (d) a description of the equipment and method used to create the digital copy;
- (e) a description of the means by which the digital copy was transferred from its source;

- (f) the type of media (e.g., DVD, flash drive, internal/external hard drive, tape backup, etc.) on which the digital copy is stored;
- (g) the identity of any computer system connected to media on which the digital copy is stored;
- (h) the identity of any computer network to which a device storing the digital copy is connected;
- (i) the Physical Location of the digital copy;
- (j) the Virtual Location of the digital copy;
- (k) the identities of the individual(s) who authorized, directed, supervised, facilitated and/or participated in the creation of the digital copy, including each such individual's name and current address, as well as his or her employer (at the time of the digitization), job title and role in the creation of the digital copy;
- (l) the identities of the individual(s) who currently have authorized access to the Physical Location and/or Virtual Location of the digital copy, including each such individual's name and current address, as well as his or her current employer, title and job description.

RESPONSE: Defendant objects to Interrogatory No. 2 to the extent that it seeks information in the possession, custody, or control of third parties and not in Defendant's or UM's possession, custody, or control. Defendant further objects to Interrogatory No. 2 on the ground that subparts (c) and (e) are vague and ambiguous in that "source" and "transferred from its source" are not defined and the meaning of such terms is not clear in the context of the Interrogatory. Defendant also objects to Interrogatory No. 2 on the ground that subparts (g), (h), (i), and (j) seek Confidential Information regarding the identity of computer systems and computer networks and regarding the "Physical Location" and "Virtual Location" of digitized works, and the disclosure of such Confidential Information would compromise the security of the HDL. Defendant further objects to Interrogatory No. 2 on the ground that subpart (k) is vague and ambiguous in that "authorized," "directed," "supervised," "facilitated" and "participated" are not defined and the meaning of such terms is not clear in the context of the Interrogatory.

Defendant also objects to Interrogatory No. 2 as overly broad and unduly burdensome to the extent that subpart (k) seeks the current address of individuals who were employed by the University at the time of the digitization but who are no longer employed by the University or involved in the HathiTrust service. Defendant further objects to Interrogatory No. 2 on the ground that subpart (l) seeks private and confidential information protected from disclosure by agreements with other parties, and by federal statutes and regulations.

Subject to the foregoing general and specific objections, and without waiving the same, Defendant responds that no Third Party Digital Copies of the Works exist and that four HathiTrust Digital Copies are created and maintained to store and preserve the digitized works in the HDL: (1) the “Initial HathiTrust Digital Copy” incorporated into the HDL, Michigan, (2) the “Mirror Site HathiTrust Digital Copy,” (3) the “First Backup Tape HathiTrust Digital Copy,” and (4) the “Second Backup Tape HathiTrust Digital Copy.” With respect to these HathiTrust Digital Copies, Defendant provides responses to subparts (a), (b), and (j) in the attached **Exhibit A**. Because Defendant’s responses to subparts (c)-(i), (k), and (l) are the same for each Work listed in Schedule A to Plaintiffs’ First Set of Interrogatories to Defendant HathiTrust (“Schedule A”) and for Plaintiffs’ convenience, Defendant provides responses to these subparts below.

In response to subparts (c)-(i), Defendant provides the information in the chart below, which applies to the HathiTrust Digital Copies for each of the Works listed on Schedule A.

	Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
(c) the identity of the source of the digital copy;	Google Return Interface	The Initial HathiTrust Digital Copy	The Initial HathiTrust Digital Copy	The First Backup Tape HathiTrust Digital Copy
(d) a description of the equipment and method used to create the digital	Google Return Interface.	Isilon SyncIQ	Tivoli Storage Manager backup	Internal Tivoli Storage Manager replication

copy;				
(e) a description of the means by which the digital copy was transferred from its source;	Google Return Interface.	Isilon SyncIQ	Tivoli Storage Manager backup protocol	Tivoli Storage Manager backup protocol
(f) the type of media (e.g., DVD, flash drive, internal/external hard drive, tape backup, etc.) on which the digital copy is stored;	Isilon Network Attached Storage	Isilon Network Attached Storage	Encrypted tape	Encrypted tape
(g) the identity of any computer system connected to media on which the digital copy is stored;	Two HathiTrust production web servers, four HathiTrust ingest servers, and four HathiTrust development web servers	Two HathiTrust production web servers and two HathiTrust data set prep / repository validation servers	Four UM Information Technology Services Tivoli Storage Manager servers located at the Michigan Academic Computing Center	Four UM Information Technology Services Tivoli Storage Manager servers located at the Arbor Lakes Data Facility
(h) the identity of any computer network to which a device storing the digital copy is connected;	The HathiTrust private computer network and the UM campus computer network	The HathiTrust private computer network and the Indiana University – Purdue University Indianapolis campus computer network	The UM campus computer network	The UM campus computer network
(i) the Physical Location of the digital copy;	Michigan Academic Computing Center, Room 100, 1000 Oakbrook Drive, Ann Arbor, Michigan	Informatics & Communications Technology Complex, Room IT 024, 535 West Michigan Street, Indianapolis, Indiana	Michigan Academic Computing Center, Room 100, 1000 Oakbrook Drive, Ann Arbor, Michigan	Arbor Lakes Data Facility, Room 9100, Arbor Lakes Building 1, 4251 Plymouth Rd., Ann Arbor, Michigan

In response to subpart (k), Defendant provides the information in the chart below, which applies to the HathiTrust Digital Copies for each of the Works listed on Schedule A. All individuals identified as employees of UM may be contacted through Defendants' counsel.

Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
By entering the December 14, 2004 Cooperative Agreement with Google, the Regents of the University of Michigan/University	The University of Michigan Library IT Core Services staff, namely, Ezra Brooks, Aaron Elkiss, Sebastien Korner,	The University of Michigan Library IT Core Services staff, namely, Ezra Brooks, Aaron Elkiss, Sebastien Korner,	The University of Michigan Library IT Core Services staff, namely, Ezra Brooks, Aaron Elkiss, Sebastien Korner,

<p>Library, Ann Arbor Campus authorized the creation of the Initial HathiTrust Digital Copy. Per the terms of the Cooperative Agreement, Google provided the Library with the ability to obtain the Initial HathiTrust Digital Copy.</p> <p>The University of Michigan Library IT Core Services staff, namely, Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavelly, all of whom are employed by the University, as well as Jessica Feeman, who was employed as a University of Michigan Library IT Core Services staff member at the time, were primarily responsible for obtaining the Initial HathiTrust Digital Copy from Google Return Interface.</p>	<p>Thomas Mooney, Ryan Rotter, and Cory Snavelly, all of whom are employed by the University, as well as Jessica Feeman, who was employed as a University of Michigan Library IT Core Services staff member at the time, were primarily responsible for the creation of the Mirror Site HathiTrust Digital Copy using Isilon SyncIQ.</p>	<p>Thomas Mooney, Ryan Rotter, and Cory Snavelly, all of whom are employed by the University, as well as Jessica Feeman, who was employed as a University of Michigan Library IT Core Services staff member at the time, were primarily responsible for the creation of the First Backup Tape HathiTrust Digital Copy using Tivoli Storage Backup manager.</p>	<p>Thomas Mooney, Ryan Rotter, and Cory Snavelly, all of whom are employed by the University, as well as Jessica Feeman, who was employed as a University of Michigan Library IT Core Services staff member at the time, were primarily responsible for the creation of the Second Backup Tape HathiTrust Digital Copy using Tivoli Storage Manager replication.</p>
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In response to subpart (l), Defendant provides the information in the chart below, which applies to the HathiTrust Digital Copies for each of the Works listed on Schedule A as of February 1, 2012. All individuals identified as employees of UM, the University of Wisconsin, or Indiana University may be contacted through Defendants’ counsel.

Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<p>Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavelly, who are System Administrators and Programmers, University of Michigan Library, are authorized for certain access to the Physical Location of the Initial HathiTrust Digital Copy.</p>	<p>Hafid Adnane, Chad Harris, and Andrew Poland, System Administrators, Indiana University, and Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavelly, who are System Administrators and Programmers, University of Michigan Library, are authorized for certain access to the Physical Location of the</p>	<p>Mike Garrison, Cameron Hanover, Phil Jessel, David Nowell, and Steve Simmons, who are Tivoli Storage Manager Administrators,</p>	<p>Mike Garrison, Cameron Hanover, Phil Jessel, David Nowell, and Steve Simmons, who are Tivoli Storage Manager Administrators,</p>

	Mirror Site HathiTrust Digital Copy.	University of Michigan Information Technology Services, are authorized for certain access to the Physical Location of the First Backup Tape HathiTrust Digital Copy.	University of Michigan Information Technology Services, are authorized for certain access to the Physical Location of the Second Backup Tape HathiTrust Digital Copy.
John Wilkin, Associate University Librarian, University of Michigan Library; Zack Lane, Copyright Researcher, Columbia University, 535 West 114th Street, New York, New York 10027; Janet Black, Kathy Marlett, Jo McClamroch, and Sherri Michaels, Copyright Researchers, Indiana University; Judith Ahronheim, David Fulmer, Dennis McWhinnie, Gregory Nichols, and Christine Wilcox, Copyright Researchers, University of Michigan; Carla Dewey Urban, Copyright Researcher, University of Minnesota, 3675 Arboretum Drive, Chaska, Minnesota, 55318; Sue Zuriff, Copyright Researchers, University of Minnesota, 309 19th Avenue South, Minneapolis, Minnesota 55455; Lisa Nachreiner, Karen Rattunde, Rita Roemer, and Al Seeger, Copyright Researchers, University of Wisconsin; Bobby Glushko, Copyright Specialist, University of Michigan Library; Melissa Levine, Lead Copyright Officer, University of Michigan Library; Benjamin Tobey, Lisa Jackson Hardman, Melvin Whitehead, Neena Adams, Bryan Birchmeier, Katie Kujala, and Monica Tsuneishi, Orphan Works Investigators, University of Michigan Library; Martin Brennan, Sharon Farb, Diane Gurman, Leslie McMichael, and Angela Riggio, Orphan Works Investigators, University of California Los Angeles, Charles E. Young Research Library	John Wilkin, Associate University Librarian, University of Michigan Library; Zack Lane, Copyright Researcher, Columbia University, 535 West 114th Street, New York, New York 10027; Janet Black, Kathy Marlett, Jo McClamroch, and Sherri Michaels, Copyright Researchers, Indiana University; Judith Ahronheim, David Fulmer, Dennis McWhinnie, Gregory Nichols, and Christine Wilcox, Copyright Researchers, University of Michigan; Carla Dewey Urban, Copyright Researcher, University of Minnesota, 3675 Arboretum Drive, Chaska, Minnesota, 55318; Sue Zuriff, Copyright Researchers, University of Minnesota, 309 19th Avenue South, Minneapolis, Minnesota 55455; Lisa Nachreiner, Karen Rattunde, Rita Roemer, and Al Seeger, Copyright Researchers, University of Wisconsin; Bobby Glushko, Copyright Specialist, University of Michigan Library; Melissa Levine, Lead Copyright Officer, University of Michigan Library; Benjamin Tobey, Lisa Jackson Hardman, Melvin Whitehead, Neena Adams, Bryan Birchmeier, Katie Kujala, and Monica Tsuneishi, Orphan Works Investigators, University of Michigan Library; Martin Brennan, Sharon Farb, Diane Gurman, Leslie McMichael, and Angela Riggio, Orphan Works Investigators, University of California Los Angeles, Charles E. Young Research Library	Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavely, who are System Administrators and Programmers, University of Michigan Library, are authorized for certain access to the Virtual Location of the First Backup Tape HathiTrust Digital Copy.	Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavely, who are System Administrators and Programmers, University of Michigan Library, are authorized for certain access to the Virtual Location of the Second Backup Tape HathiTrust Digital Copy.

<p>Building, Los Angeles, California 90095-1575; Lara Unger and Lawrence Wentzel, Digitization Specialists, University of Michigan Library; Jackie Bronicki, Image Quality Researcher, University of Michigan Library; Emily Campbell, Martin Knott, Connie McGuire, Liz Mustard, Chris Powell, and Ellen Wilson, Librarians, University of Michigan Library; Shane Beers, Digital Preservation Specialist, University of Michigan Library; Tom West-Burton, Roger Espinosa, Phillip Farber, Nasir Grewal, Brian Hall, Tim Prettyman, Pranay Sethi, Peter Ulintz, and John Weise, Programmers, University of Michigan Library; Kat Hagedorn, Project Manager, University of Michigan Library; Julia Lovett and Jeremy York, Special Projects Librarians, University of Michigan Library; Angelina Zaytsev, Project Assistant, University of Michigan Library; Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavely, System Administrators and Programmers, University of Michigan Library; Suzanne Chapman, User Interface Specialist, University of Michigan Library; and 32 University of Michigan students and/or employees who receive authorization through the University of Michigan's Office of Services for Students with Disabilities as part of the reasonable accommodations provided to them under federal law are authorized for certain access to the Virtual Location of the Initial HathiTrust Digital Copy.</p>	<p>Building, Los Angeles, California 90095-1575; Lara Unger and Lawrence Wentzel, Digitization Specialists, University of Michigan Library; Jackie Bronicki, Image Quality Researcher, University of Michigan Library; Emily Campbell, Martin Knott, Connie McGuire, Liz Mustard, Chris Powell, and Ellen Wilson, Librarians, University of Michigan Library; Shane Beers, Digital Preservation Specialist, University of Michigan Library; Tom West-Burton, Roger Espinosa, Phillip Farber, Nasir Grewal, Brian Hall, Tim Prettyman, Pranay Sethi, Peter Ulintz, and John Weise, Programmers, University of Michigan Library; Kat Hagedorn, Project Manager, University of Michigan Library; Julia Lovett and Jeremy York, Special Projects Librarians, University of Michigan Library; Angelina Zaytsev, Project Assistant, University of Michigan Library; Ezra Brooks, Aaron Elkiss, Sebastien Korner, Thomas Mooney, Ryan Rotter, and Cory Snavely, System Administrators and Programmers, University of Michigan Library; Suzanne Chapman, User Interface Specialist, University of Michigan Library, and 32 University of Michigan students and/or employees who receive authorization through the University of Michigan's Office of Services for Students with Disabilities as part of the reasonable accommodations provided to them under federal law are authorized for certain access to the Virtual Location of the Second HathiTrust Digital Copy.</p>		
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DATED: February 8, 2012

Respectfully Submitted,



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Attorneys for Defendants

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Bok-Norge : en litteratursosiologisk oversikt</i> by Trond Andreassen					
	(b) the date the digital copy was created;	October 25, 2007	December 1, 2008	November 13, 2008	November 13, 2008
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/50/52/28/49/39015050522849/39015050522849.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/50/52/28/49/39015050522849/39015050522849.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/50/52/28/49/39015050522849/39015050522849.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/50/52/28/49/39015050522849/39015050522849.zip
<i>C.L.O.U.D.S.</i> by Pat Cummings					
	(b) the date the digital copy was created;	October 9, 2009	October 9, 2009	October 10, 2009	October 10, 2009
	(j) the Virtual Location of the digital copy;	/sdr18/obj/mdp/pairtree_root/39/01/50/14/28/03/85/39015014280385/39015014280385.zip	/sdr18/obj/mdp/pairtree_root/39/01/50/14/28/03/85/39015014280385/39015014280385.zip	/sdr18/obj/mdp/pairtree_root/39/01/50/14/28/03/85/39015014280385/39015014280385.zip	/sdr18/obj/mdp/pairtree_root/39/01/50/14/28/03/85/39015014280385/39015014280385.zip
<i>C.L.O.U.D.S.</i> by Pat Cummings					
	(b) the date the digital copy was created;	January 6, 2011	January 6, 2011	January 7, 2011	January 7, 2011
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/49/01/50/00/89/65/98/49015000896598/49015000896598.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/00/89/65/98/49015000896598/49015000896598.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/00/89/65/98/49015000896598/49015000896598.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/00/89/65/98/49015000896598/49015000896598.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Clean Your Room, Harvey Moon!</i> By Pat Cummings					
	(b) the date the digital copy was created;	January 6, 2011	January 6, 2011	January 6, 2011	January 6, 2011
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/07/32/49015001470732/49015001470732.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/07/32/49015001470732/49015001470732.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/07/32/49015001470732/49015001470732.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/07/32/49015001470732/49015001470732.zip
<i>Jimmy Lee Did It</i> by Pat Cummings					
	(b) the date the digital copy was created;	January 19, 2011	January 19, 2011	January 20, 2011	January 20, 2011
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/12/50/49015001471250/49015001471250.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/12/50/49015001471250/49015001471250.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/12/50/49015001471250/49015001471250.zip	/sdr7/obj/mdp/pairtree_root/49/01/50/01/47/12/50/49015001471250/49015001471250.zip
<i>Talking With Artists: Volume 1</i> by Pat Cummings					
	(b) the date the digital copy was created;	September 7, 2009	September 7, 2009	September 8, 2009	September 8, 2009
	(j) the Virtual Location of the digital copy;	/sdr16/obj/mdp/pairtree_root/39/01/50/29/57/08/61/39015029570861/39015029570861.zip	/sdr16/obj/mdp/pairtree_root/39/01/50/29/57/08/61/39015029570861/39015029570861.zip	/sdr16/obj/mdp/pairtree_root/39/01/50/29/57/08/61/39015029570861/39015029570861.zip	/sdr16/obj/mdp/pairtree_root/39/01/50/29/57/08/61/39015029570861/39015029570861.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Talking With Artists: Volume 2</i> by Pat Cummings					
	(b) the date the digital copy was created;	September 30, 2009	September 30, 2009	October 4, 2009	October 4, 2009
	(j) the Virtual Location of the digital copy;	/sdr17/obj/mdp/pairtree_root/39/01/50/37/76/92/65/39015037769265/39015037769265.zip	/sdr17/obj/mdp/pairtree_root/39/01/50/37/76/92/65/39015037769265/39015037769265.zip	/sdr17/obj/mdp/pairtree_root/39/01/50/37/76/92/65/39015037769265/39015037769265.zip	/sdr17/obj/mdp/pairtree_root/39/01/50/37/76/92/65/39015037769265/39015037769265.zip
<i>Talking With Adventurers</i> by Pat Cummings					
	(b) the date the digital copy was created;	November 26, 2009	November 26, 2009	November 28, 2009	November 28, 2009
	(j) the Virtual Location of the digital copy;	/sdr19/obj/uc1/pairtree_root/31/82/20/33/43/68/41/31822033436841/31822033436841.zip	/sdr19/obj/uc1/pairtree_root/31/82/20/33/43/68/41/31822033436841/31822033436841.zip	/sdr19/obj/uc1/pairtree_root/31/82/20/33/43/68/41/31822033436841/31822033436841.zip	/sdr19/obj/uc1/pairtree_root/31/82/20/33/43/68/41/31822033436841/31822033436841.zip
<i>Oss målvakter emellan</i> by Erik Grundstrom					
	(b) the date the digital copy was created;	February 6, 2010	February 6, 2010	February 7, 2010	February 7, 2010
	(j) the Virtual Location of the digital copy;	/sdr21/obj/wu/pairtree_root/89/01/46/79/54/2/89014679542/89014679542.zip	/sdr21/obj/wu/pairtree_root/89/01/46/79/54/2/89014679542/89014679542.zip	/sdr21/obj/wu/pairtree_root/89/01/46/79/54/2/89014679542/89014679542.zip	/sdr21/obj/wu/pairtree_root/89/01/46/79/54/2/89014679542/89014679542.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Vernacular Dreams</i> by Angelo Loukakis					
	(b) the date the digital copy was created;	April 8, 2009	April 8, 2009	April 9, 2009	April 9, 2009
	(j) the Virtual Location of the digital copy;	/sdr9/obj/mdp/pairtree_root/39/01/50/30/75/66/65/39015030756665/39015030756665.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/30/75/66/65/39015030756665/39015030756665.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/30/75/66/65/39015030756665/39015030756665.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/30/75/66/65/39015030756665/39015030756665.zip
<i>Good troupers all: the story of Joseph Jefferson</i> by Gladys Malvern					
	(b) the date the digital copy was created;	February 10, 2011	February 10, 2011	February 12, 2011	February 12, 2011
	(j) the Virtual Location of the digital copy;	/sdr7/obj/uc1/pairtree_root/\$b/38/48/70/\$b384870/\$b384870.zip	/sdr7/obj/uc1/pairtree_root/\$b/38/48/70/\$b384870/\$b384870.zip	/sdr7/obj/uc1/pairtree_root/\$b/38/48/70/\$b384870/\$b384870.zip	/sdr7/obj/uc1/pairtree_root/\$b/38/48/70/\$b384870/\$b384870.zip
<i>Summer light</i> by Roxana Robinson					
	(b) the date the digital copy was created;	May 31, 2008	December 10, 2008	November 28, 2008	November 28, 2008
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/19/34/54/72/39015019345472/39015019345472.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/34/54/72/39015019345472/39015019345472.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/34/54/72/39015019345472/39015019345472.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/34/54/72/39015019345472/39015019345472.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Georgia O'Keeffe: a life</i> by Roxana Robinson					
	(b) the date the digital copy was created;	January 26, 2008	December 10, 2008	November 26, 2008	November 26, 2008
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/15/44/99/14/39015015449914/39015015449914.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/44/99/14/39015015449914/39015015449914.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/44/99/14/39015015449914/39015015449914.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/44/99/14/39015015449914/39015015449914.zip
<i>A glimpse of scarlet and other stories</i> by Roxana Robinson					
	(b) the date the digital copy was created;	November 11, 2009	November 11, 2009	November 11, 2009	November 11, 2009
	(j) the Virtual Location of the digital copy;	/sdr4/obj/mdp/pairtree_root/39/01/50/22/00/81/09/39015022008109/39015022008109.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/22/00/81/09/39015022008109/39015022008109.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/22/00/81/09/39015022008109/39015022008109.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/22/00/81/09/39015022008109/39015022008109.zip
<i>A glimpse of scarlet and other stories</i> by Roxana Robinson					
	(b) the date the digital copy was created;	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr21/obj/mdp/pairtree_root/39/01/50/21/56/27/42/39015021562742/39015021562742.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/21/56/27/42/39015021562742/39015021562742.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/21/56/27/42/39015021562742/39015021562742.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/21/56/27/42/39015021562742/39015021562742.zip
<i>Asking for love and other stories</i> by Roxana Robinson					
	(b) the date the digital copy was created;	May 31, 2008	December 10, 2008	October 26, 2008	October 26, 2008
	(j) the Virtual Location of the digital copy;	/sdr5/obj/mdp/pairtree_root/39/01/50/37/47/07/24/39015037470724/39015037470724.zip	/sdr5/obj/mdp/pairtree_root/39/01/50/37/47/07/24/39015037470724/39015037470724.zip	/sdr5/obj/mdp/pairtree_root/39/01/50/37/47/07/24/39015037470724/39015037470724.zip	/sdr5/obj/mdp/pairtree_root/39/01/50/37/47/07/24/39015037470724/39015037470724.zip
<i>Sweetwater : a novel</i> by Roxana Robinson					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 20, 2008	November 20, 2008
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/56/79/32/87/39015056793287/39015056793287.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/79/32/87/39015056793287/39015056793287.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/79/32/87/39015056793287/39015056793287.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/79/32/87/39015056793287/39015056793287.zip
<i>A perfect stranger: and other stories</i> by Roxana Robinson					

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(b) the date the digital copy was created;	September 23, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	(j) the Virtual Location of the digital copy;	/sdr9/obj/mdp/pairtree_root/39/01/50/60/83/84/90/39015060838490/39015060838490.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/83/84/90/39015060838490/39015060838490.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/83/84/90/39015060838490/39015060838490.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/83/84/90/39015060838490/39015060838490.zip
<i>Den umulige friheten : Henrik Ibsen og moderniteten</i> by Helge Ronning					
	(b) the date the digital copy was created;	January 4, 2010	January 4, 2010	January 5, 2010	January 5, 2010
	(j) the Virtual Location of the digital copy;	/sdr21/obj/wu/pairtree_root/89/09/20/04/95/1/89092004951/89092004951.zip	/sdr21/obj/wu/pairtree_root/89/09/20/04/95/1/89092004951/89092004951.zip	/sdr21/obj/wu/pairtree_root/89/09/20/04/95/1/89092004951/89092004951.zip	/sdr21/obj/wu/pairtree_root/89/09/20/04/95/1/89092004951/89092004951.zip
<i>Dødsdom over et folk? : imperialismen og Biafrakonflikten</i> by Helge Ronning					
	(b) the date the digital copy was created;	December 19, 2009	December 19, 2009	December 19, 2009	December 19, 2009
	(j) the Virtual Location of the digital copy;	/sdr21/obj/uc1/pairtree_root/b2/84/22/01/b2842201/b2842201.zip	/sdr21/obj/uc1/pairtree_root/b2/84/22/01/b2842201/b2842201.zip	/sdr21/obj/uc1/pairtree_root/b2/84/22/01/b2842201/b2842201.zip	/sdr21/obj/uc1/pairtree_root/b2/84/22/01/b2842201/b2842201.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Marguerite Duras à Montréal</i> by André Roy					
	(b) the date the digital copy was created;	October 20, 2008	December 10, 2008	October 29, 2008	October 29, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/10/73/51/19/39015010735119/39015010735119.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/10/73/51/19/39015010735119/39015010735119.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/10/73/51/19/39015010735119/39015010735119.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/10/73/51/19/39015010735119/39015010735119.zip
<i>Marguerite Duras à Montréal</i> by André Roy					
	(b) the date the digital copy was created;	August 22, 2010	August 22, 2010	August 22, 2010	August 22, 2010
	(j) the Virtual Location of the digital copy;	/sdr20/obj/uc1/pairtree_root/32/10/60/08/36/50/97/32106008365097/32106008365097.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/08/36/50/97/32106008365097/32106008365097.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/08/36/50/97/32106008365097/32106008365097.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/08/36/50/97/32106008365097/32106008365097.zip
<i>Southern light : a novel</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	April 9, 2009	April 9, 2009	April 9, 2009	April 9, 2009
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/48/88/16/46/39015048881646/39015048881646.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/88/16/46/39015048881646/39015048881646.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/88/16/46/39015048881646/39015048881646.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/88/16/46/39015048881646/39015048881646.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>Embarkation</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	March 25, 2009	March 25, 2009	March 26, 2009	March 26, 2009
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/42/39015002754342/39015002754342.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/42/39015002754342/39015002754342.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/42/39015002754342/39015002754342.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/42/39015002754342/39015002754342.zip
<i>The lost country: a novel</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	April 3, 2009	April 3, 2009	April 3, 2009	April 3, 2009
	(j) the Virtual Location of the digital copy;	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/45/32/39015002754532/39015002754532.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/45/32/39015002754532/39015002754532.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/45/32/39015002754532/39015002754532.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/45/32/39015002754532/39015002754532.zip
<i>A sea change</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	August 14, 2008	December 10, 2008	October 14, 2008	October 14, 2008
	(j) the Virtual Location of the digital copy;	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/43/59/39015002754359/39015002754359.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/43/59/39015002754359/39015002754359.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/43/59/39015002754359/39015002754359.zip	/sdr2/obj/mdp/pairtree_root/39/01/50/02/75/43/59/39015002754359/39015002754359.zip

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
<i>That summer's trance : a novel</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/42/95/43/08/39015042954308/39015042954308.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/95/43/08/39015042954308/39015042954308.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/95/43/08/39015042954308/39015042954308.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/95/43/08/39015042954308/39015042954308.zip
<i>Lilith</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	May 22, 2008	December 10, 2008	December 5, 2008	December 5, 2008
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/67/39015002754367/39015002754367.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/67/39015002754367/39015002754367.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/67/39015002754367/39015002754367.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/02/75/43/67/39015002754367/39015002754367.zip
<i>Lilith</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	November 4, 2010	November 4, 2010	November 5, 2010	November 5, 2010
	(j) the Virtual Location of the digital copy;	/sdr15/obj/uc1/pairtree_root/b4/08/47/83/b4084783/b4084783.zip	/sdr15/obj/uc1/pairtree_root/b4/08/47/83/b4084783/b4084783.zip	/sdr15/obj/uc1/pairtree_root/b4/08/47/83/b4084783/b4084783.zip	/sdr15/obj/uc1/pairtree_root/b4/08/47/83/b4084783/b4084783.zip
<i>Embarkation</i> by J.R. Salamanca					

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(b) the date the digital copy was created;	March 8, 2011	March 8, 2011	March 10, 2011	March 10, 2011
	(j) the Virtual Location of the digital copy;	/sdr8/obj/uc1/pairtree_root/b4/35/87/48/b4358748/b4358748.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/48/b4358748/b4358748.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/48/b4358748/b4358748.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/48/b4358748/b4358748.zip
<i>The lost country: a novel</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	September 18, 2010	September 18, 2010	September 19, 2010	September 19, 2010
	(j) the Virtual Location of the digital copy;	/sdr15/obj/uc1/pairtree_root/b4/35/87/49/b4358749/b4358749.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/49/b4358749/b4358749.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/49/b4358749/b4358749.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/49/b4358749/b4358749.zip
<i>A sea change</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	March 8, 2011	March 8, 2011	March 10, 2011	March 10, 2011
	(j) the Virtual Location of the digital copy;	/sdr8/obj/uc1/pairtree_root/b4/35/87/50/b4358750/b4358750.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/50/b4358750/b4358750.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/50/b4358750/b4358750.zip	/sdr8/obj/uc1/pairtree_root/b4/35/87/50/b4358750/b4358750.zip
<i>Southern light : a novel</i> by J.R. Salamanca					
	(b) the date the digital copy was created;	September 15, 2010	September 15, 2010	September 15, 2010	September 15, 2010

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr15/obj/uc1/pairtree_root/b4/35/87/51/b4358751/b4358751.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/51/b4358751/b4358751.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/51/b4358751/b4358751.zip	/sdr15/obj/uc1/pairtree_root/b4/35/87/51/b4358751/b4358751.zip
<i>Oberammergau</i> by James Shapiro					
	(b) the date the digital copy was created;	October 24, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/42/55/31/34/39015042553134/39015042553134.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/55/31/34/39015042553134/39015042553134.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/55/31/34/39015042553134/39015042553134.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/42/55/31/34/39015042553134/39015042553134.zip
<i>Je cours plus vite que la lycose : poèmes</i> by Danièle Simpson					
	(b) the date the digital copy was created;	April 22, 2010	April 22, 2010	April 24, 2010	April 24, 2010
	(j) the Virtual Location of the digital copy;	/sdr23/obj/wu/pairtree_root/89/01/03/18/53/3/89010318533/89010318533.zip	/sdr23/obj/wu/pairtree_root/89/01/03/18/53/3/89010318533/89010318533.zip	/sdr23/obj/wu/pairtree_root/89/01/03/18/53/3/89010318533/89010318533.zip	/sdr23/obj/wu/pairtree_root/89/01/03/18/53/3/89010318533/89010318533.zip
<i>Jesse James : last rebel of the Civil War</i> by T.J. Stiles					
	(b) the date the digital copy was created;	January 5, 2009	January 5, 2009	January 5, 2009	January 5, 2009

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr11/obj/mdp/pairtree_root/39/01/50/55/82/32/00/39015055823200/39015055823200.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/55/82/32/00/39015055823200/39015055823200.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/55/82/32/00/39015055823200/39015055823200.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/55/82/32/00/39015055823200/39015055823200.zip
<i>Watching me, watching you</i> by Fay Weldon					
	(b) the date the digital copy was created;	December 2, 2008	December 2, 2008	December 3, 2008	December 3, 2008
	(j) the Virtual Location of the digital copy;	/sdr11/obj/mdp/pairtree_root/39/01/50/16/98/17/58/39015016981758/39015016981758.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/16/98/17/58/39015016981758/39015016981758.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/16/98/17/58/39015016981758/39015016981758.zip	/sdr11/obj/mdp/pairtree_root/39/01/50/16/98/17/58/39015016981758/39015016981758.zip
<i>Praxis : a novel</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 27, 2008	December 10, 2008	October 28, 2008	October 28, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/01/78/85/49/39015001788549/39015001788549.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/78/85/49/39015001788549/39015001788549.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/78/85/49/39015001788549/39015001788549.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/78/85/49/39015001788549/39015001788549.zip
<i>Puffball : a novel</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/01/52/68/16/39015001526816/39015001526816.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/52/68/16/39015001526816/39015001526816.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/52/68/16/39015001526816/39015001526816.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/01/52/68/16/39015001526816/39015001526816.zip
<i>Remember me</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	December 6, 2008	December 6, 2008
	(j) the Virtual Location of the digital copy;	/sdr7/obj/mdp/pairtree_root/39/01/50/04/12/41/89/39015004124189/39015004124189.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/04/12/41/89/39015004124189/39015004124189.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/04/12/41/89/39015004124189/39015004124189.zip	/sdr7/obj/mdp/pairtree_root/39/01/50/04/12/41/89/39015004124189/39015004124189.zip
<i>The heart of the country</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/12/99/26/19/39015012992619/39015012992619.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/12/99/26/19/39015012992619/39015012992619.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/12/99/26/19/39015012992619/39015012992619.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/12/99/26/19/39015012992619/39015012992619.zip
<i>The hearts and lives of men</i> by Fay Weldon					
	(b) the date the digital copy was created;	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/12/99/54/89/39015012995489/39015012995489.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/99/54/89/39015012995489/39015012995489.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/99/54/89/39015012995489/39015012995489.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/99/54/89/39015012995489/39015012995489.zip
<i>The rules of life</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 17, 2008	November 17, 2008
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/12/98/86/74/39015012988674/39015012988674.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/98/86/74/39015012988674/39015012988674.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/98/86/74/39015012988674/39015012988674.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/12/98/86/74/39015012988674/39015012988674.zip
<i>The Shrapnel Academy</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/14/72/24/10/39015014722410/39015014722410.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/72/24/10/39015014722410/39015014722410.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/72/24/10/39015014722410/39015014722410.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/72/24/10/39015014722410/39015014722410.zip
<i>The heart of the country</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 11, 2009	October 11, 2009	October 13, 2009	October 13, 2009

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr4/obj/mdp/pairtree_root/39/01/50/25/81/37/37/39015025813737/39015025813737.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/25/81/37/37/39015025813737/39015025813737.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/25/81/37/37/39015025813737/39015025813737.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/25/81/37/37/39015025813737/39015025813737.zip
<i>Sacred cows</i> by Fay Weldon					
	(b) the date the digital copy was created;	June 15, 2009	June 15, 2009	June 18, 2009	June 18, 2009
	(j) the Virtual Location of the digital copy;	/sdr13/obj/mdp/pairtree_root/39/01/50/47/56/16/03/39015047561603/39015047561603.zip	/sdr13/obj/mdp/pairtree_root/39/01/50/47/56/16/03/39015047561603/39015047561603.zip	/sdr13/obj/mdp/pairtree_root/39/01/50/47/56/16/03/39015047561603/39015047561603.zip	/sdr13/obj/mdp/pairtree_root/39/01/50/47/56/16/03/39015047561603/39015047561603.zip
<i>The fat woman's joke</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 29, 2008	November 29, 2008
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/19/98/21/18/39015019982118/39015019982118.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/98/21/18/39015019982118/39015019982118.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/98/21/18/39015019982118/39015019982118.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/19/98/21/18/39015019982118/39015019982118.zip
<i>The cloning of Joanna May</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/14/75/38/52/39015014753852/39015014753852.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/75/38/52/39015014753852/39015014753852.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/75/38/52/39015014753852/39015014753852.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/14/75/38/52/39015014753852/39015014753852.zip
<i>Little sisters</i> by Fay Weldon					
	(b) the date the digital copy was created;	May 9, 2007	December 10, 2008	November 26, 2008	November 26, 2008
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/15/51/98/15/39015015519815/39015015519815.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/51/98/15/39015015519815/39015015519815.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/51/98/15/39015015519815/39015015519815.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/15/51/98/15/39015015519815/39015015519815.zip
<i>Darcy's utopia</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/18/93/34/92/39015018933492/39015018933492.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/18/93/34/92/39015018933492/39015018933492.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/18/93/34/92/39015018933492/39015018933492.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/18/93/34/92/39015018933492/39015018933492.zip
<i>The cloning of Joanna May</i> by Fay Weldon					
	(b) the date the digital copy was created;	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr21/obj/mdp/pairtree_root/39/01/50/19/43/73/78/39015019437378/39015019437378.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/19/43/73/78/39015019437378/39015019437378.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/19/43/73/78/39015019437378/39015019437378.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/19/43/73/78/39015019437378/39015019437378.zip
<i>Moon over Minneapolis/Why she couldn't stay</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/21/99/13/62/39015021991362/39015021991362.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/21/99/13/62/39015021991362/39015021991362.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/21/99/13/62/39015021991362/39015021991362.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/21/99/13/62/39015021991362/39015021991362.zip
<i>Life force</i> by Fay Weldon					
	(b) the date the digital copy was created;	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/56/89/04/63/39015056890463/39015056890463.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/89/04/63/39015056890463/39015056890463.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/89/04/63/39015056890463/39015056890463.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/56/89/04/63/39015056890463/39015056890463.zip
<i>Growing rich</i> by Fay Weldon					
	(b) the date the digital copy was created;	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/25/20/07/29/39015025200729/39015025200729.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/25/20/07/29/39015025200729/39015025200729.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/25/20/07/29/39015025200729/39015025200729.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/25/20/07/29/39015025200729/39015025200729.zip
<i>Life force</i> by Fay Weldon					
	(b) the date the digital copy was created;	February 14, 2009	February 14, 2009	February 14, 2009	February 14, 2009
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/55/16/61/96/39015055166196/39015055166196.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/16/61/96/39015055166196/39015055166196.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/16/61/96/39015055166196/39015055166196.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/16/61/96/39015055166196/39015055166196.zip
<i>Trouble</i> by Fay Weldon					
	(b) the date the digital copy was created;	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010
	(j) the Virtual Location of the digital copy;	/sdr21/obj/mdp/pairtree_root/39/01/50/32/71/94/48/39015032719448/39015032719448.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/32/71/94/48/39015032719448/39015032719448.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/32/71/94/48/39015032719448/39015032719448.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/32/71/94/48/39015032719448/39015032719448.zip
<i>Affliction</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 12, 2008	November 12, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/34/41/08/63/39015034410863/39015034410863.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/41/08/63/39015034410863/39015034410863.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/41/08/63/39015034410863/39015034410863.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/41/08/63/39015034410863/39015034410863.zip
<i>Splitting</i> by Fay Weldon					
	(b) the date the digital copy was created;	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/34/89/79/45/39015034897945/39015034897945.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/89/79/45/39015034897945/39015034897945.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/89/79/45/39015034897945/39015034897945.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/34/89/79/45/39015034897945/39015034897945.zip
<i>Wicked women : stories</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2010	October 3, 2010	November 4, 2010	November 4, 2010
	(j) the Virtual Location of the digital copy;	/sdr4/obj/mdp/pairtree_root/49/01/50/02/45/16/73/49015002451673/49015002451673.zip	/sdr4/obj/mdp/pairtree_root/49/01/50/02/45/16/73/49015002451673/49015002451673.zip	/sdr4/obj/mdp/pairtree_root/49/01/50/02/45/16/73/49015002451673/49015002451673.zip	/sdr4/obj/mdp/pairtree_root/49/01/50/02/45/16/73/49015002451673/49015002451673.zip
<i>Leader of the band</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 18, 2008	November 18, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/98/16/39015055109816/39015055109816.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/98/16/39015055109816/39015055109816.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/98/16/39015055109816/39015055109816.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/98/16/39015055109816/39015055109816.zip
<i>Growing rich</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 18, 2008	November 18, 2008
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/72/39015055109972/39015055109972.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/72/39015055109972/39015055109972.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/72/39015055109972/39015055109972.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/72/39015055109972/39015055109972.zip
<i>The hearts and lives of men</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 18, 2008	November 18, 2008
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/64/39015055109964/39015055109964.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/64/39015055109964/39015055109964.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/64/39015055109964/39015055109964.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/55/10/99/64/39015055109964/39015055109964.zip
<i>A hard time to be a father: a collection of short stories</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 1, 2008	November 1, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/55/10/98/24/39015055109824/39015055109824.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/10/98/24/39015055109824/39015055109824.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/10/98/24/39015055109824/39015055109824.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/10/98/24/39015055109824/39015055109824.zip
<i>Life force</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 10, 2008	November 10, 2008
	(j) the Virtual Location of the digital copy;	/sdr4/obj/mdp/pairtree_root/39/01/50/29/18/60/64/39015029186064/39015029186064.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/29/18/60/64/39015029186064/39015029186064.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/29/18/60/64/39015029186064/39015029186064.zip	/sdr4/obj/mdp/pairtree_root/39/01/50/29/18/60/64/39015029186064/39015029186064.zip
<i>Nothing to wear and nowhere to hide: stories</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	November 1, 2008	November 1, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/55/85/96/00/39015055859600/39015055859600.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/85/96/00/39015055859600/39015055859600.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/85/96/00/39015055859600/39015055859600.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/85/96/00/39015055859600/39015055859600.zip
<i>Big women</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 29, 2008	November 29, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr8/obj/mdp/pairtree_root/39/01/50/40/36/71/49/39015040367149/39015040367149.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/40/36/71/49/39015040367149/39015040367149.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/40/36/71/49/39015040367149/39015040367149.zip	/sdr8/obj/mdp/pairtree_root/39/01/50/40/36/71/49/39015040367149/39015040367149.zip
<i>Godless in Eden : a book of essays</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 31, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/48/57/82/34/39015048578234/39015048578234.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/57/82/34/39015048578234/39015048578234.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/57/82/34/39015048578234/39015048578234.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/48/57/82/34/39015048578234/39015048578234.zip
<i>Rhode Island blues</i> by Fay Weldon					
	(b) the date the digital copy was created;	October 27, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/49/52/44/27/39015049524427/39015049524427.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/49/52/44/27/39015049524427/39015049524427.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/49/52/44/27/39015049524427/39015049524427.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/49/52/44/27/39015049524427/39015049524427.zip
<i>The Bulgari connection</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 19, 2008	December 10, 2008	November 17, 2008	November 17, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr6/obj/mdp/pairtree_root/39/01/50/53/74/68/41/39015053746841/39015053746841.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/53/74/68/41/39015053746841/39015053746841.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/53/74/68/41/39015053746841/39015053746841.zip	/sdr6/obj/mdp/pairtree_root/39/01/50/53/74/68/41/39015053746841/39015053746841.zip
<i>Auto da fay</i> by Fay Weldon					
	(b) the date the digital copy was created;	November 11, 2009	November 11, 2009	November 12, 2009	November 12, 2009
	(j) the Virtual Location of the digital copy;	/sdr10/obj/mdp/pairtree_root/39/01/50/55/18/15/75/39015055181575/39015055181575.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/18/15/75/39015055181575/39015055181575.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/18/15/75/39015055181575/39015055181575.zip	/sdr10/obj/mdp/pairtree_root/39/01/50/55/18/15/75/39015055181575/39015055181575.zip
<i>Flood warning : a play</i> by Fay Weldon					
	(b) the date the digital copy was created;	July 10, 2009	July 10, 2009	July 10, 2009	July 10, 2009
	(j) the Virtual Location of the digital copy;	/sdr14/obj/mdp/pairtree_root/39/01/50/58/11/87/98/39015058118798/39015058118798.zip	/sdr14/obj/mdp/pairtree_root/39/01/50/58/11/87/98/39015058118798/39015058118798.zip	/sdr14/obj/mdp/pairtree_root/39/01/50/58/11/87/98/39015058118798/39015058118798.zip	/sdr14/obj/mdp/pairtree_root/39/01/50/58/11/87/98/39015058118798/39015058118798.zip
<i>Wicked women : stories</i> by Fay Weldon					
	(b) the date the digital copy was created;	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr21/obj/mdp/pairtree_root/39/01/50/41/77/09/52/39015041770952/39015041770952.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/41/77/09/52/39015041770952/39015041770952.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/41/77/09/52/39015041770952/39015041770952.zip	/sdr21/obj/mdp/pairtree_root/39/01/50/41/77/09/52/39015041770952/39015041770952.zip
<i>Mantrapped by Fay Weldon</i>					
	(b) the date the digital copy was created;	September 21, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	(j) the Virtual Location of the digital copy;	/sdr9/obj/mdp/pairtree_root/39/01/50/60/12/34/14/39015060123414/39015060123414.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/12/34/14/39015060123414/39015060123414.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/12/34/14/39015060123414/39015060123414.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/60/12/34/14/39015060123414/39015060123414.zip
<i>She may not leave by Fay Weldon</i>					
	(b) the date the digital copy was created;	October 2, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	(j) the Virtual Location of the digital copy;	/sdr9/obj/mdp/pairtree_root/39/01/50/62/61/12/42/39015062611242/39015062611242.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/62/61/12/42/39015062611242/39015062611242.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/62/61/12/42/39015062611242/39015062611242.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/62/61/12/42/39015062611242/39015062611242.zip
<i>The spa decameron by Fay Weldon</i>					
	(b) the date the digital copy was created;	September 22, 2008	December 10, 2008	December 19, 2008	December 19, 2008

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr9/obj/mdp/pairtree_root/39/01/50/70/73/93/81/39015070739381/39015070739381.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/70/73/93/81/39015070739381/39015070739381.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/70/73/93/81/39015070739381/39015070739381.zip	/sdr9/obj/mdp/pairtree_root/39/01/50/70/73/93/81/39015070739381/39015070739381.zip
<i>The hearts and lives of men</i> by Fay Weldon					
	(b) the date the digital copy was created;	September 2, 2010	September 2, 2010	September 3, 2010	September 3, 2010
	(j) the Virtual Location of the digital copy;	/sdr20/obj/uc1/pairtree_root/32/10/60/07/94/05/51/32106007940551/32106007940551.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/07/94/05/51/32106007940551/32106007940551.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/07/94/05/51/32106007940551/32106007940551.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/07/94/05/51/32106007940551/32106007940551.zip
<i>Big women</i> by Fay Weldon					
	(b) the date the digital copy was created;	September 1, 2010	September 1, 2010	September 3, 2010	September 3, 2010
	(j) the Virtual Location of the digital copy;	/sdr20/obj/uc1/pairtree_root/32/10/60/14/72/05/74/32106014720574/32106014720574.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/14/72/05/74/32106014720574/32106014720574.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/14/72/05/74/32106014720574/32106014720574.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/14/72/05/74/32106014720574/32106014720574.zip
<i>Life force</i> by Fay Weldon					
	(b) the date the digital copy was created;	September 2, 2010	September 2, 2010	September 3, 2010	September 3, 2010

Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant HathiTrust
Interrogatory No. 2

(a) the title and author of the Work;		Initial HathiTrust Digital Copy	Mirror Site HathiTrust Digital Copy	First Backup Tape HathiTrust Digital Copy	Second Backup Tape HathiTrust Digital Copy
	(j) the Virtual Location of the digital copy;	/sdr20/obj/uc1/pairtree_root/32/10/60/11/83/50/37/32106011835037/32106011835037.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/11/83/50/37/32106011835037/32106011835037.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/11/83/50/37/32106011835037/32106011835037.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/11/83/50/37/32106011835037/32106011835037.zip
<i>Worst fears</i> by Fay Weldon					
	(b) the date the digital copy was created;	September 2, 2010	September 2, 2010	September 3, 2010	September 3, 2010
	(j) the Virtual Location of the digital copy;	/sdr20/obj/uc1/pairtree_root/32/10/60/13/24/82/05/32106013248205/32106013248205.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/13/24/82/05/32106013248205/32106013248205.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/13/24/82/05/32106013248205/32106013248205.zip	/sdr20/obj/uc1/pairtree_root/32/10/60/13/24/82/05/32106013248205/32106013248205.zip

VERIFICATION

I, Paul N. Courant, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am University Librarian and Dean of Libraries at The University of Michigan (“UM”).
2. All of the information provided in the attached Responses to Plaintiffs’ First Set of Interrogatories to Defendant HathiTrust has been gathered from various employees of UM.
3. I am informed and believe that the best efforts of those employees have been employed in procuring the information, and on that basis I am informed and believe that the information is true and correct.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 8th day of February, 2012.



Paul N. Courant