

# **EXHIBIT 75**

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**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 MARY SUE**  
**COLEMAN**

Defendant Mary Sue Coleman (“Defendant”), in her official capacity as President of The University of Michigan (the “University”) states the following objections and responses to Plaintiffs’ First Set of Interrogatories to Defendant Mary Sue Coleman 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 the University with personal knowledge of the relevant facts.

**A. GENERAL OBJECTIONS AND LIMITATIONS**

1. 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.

2. 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.

3. 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 or the Local Rules.

4. 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.

5. 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.

6. 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 defendant 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.

7. 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, the University’s, or the Library’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, the University’s, and the 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.

8. 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.

9. 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.

10. 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.

11. 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.

12. Defendant objects to the Interrogatories in their entirety and to each Interrogatory to the extent they fail to contain defined time periods or limits, or seek information outside of the relevant time period. In particular, Defendant objects to all demands in the Interrogatories that require Defendant to search for, produce, disclose or identify information without any limitation as to time. Unless otherwise indicated in a particular Interrogatory or the response thereto, Defendant's responses refer only to the time period between October 6, 2008 and October 6, 2011.

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" and to each Interrogatory including that term 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 "Library" on the ground that it is

vague and ambiguous.

3. Defendant objects to Plaintiffs' definition of "Master Print Copy" and to each Interrogatory including that term as vague and ambiguous in that Plaintiffs' definition of "Master Print Copy" refers to each "original print copy" without identifying the meaning of "original." As used in Plaintiffs' Interrogatories and these responses, Defendant understands "Master Print Copy" to refer to a print copy of a Work purchased or otherwise acquired through lawful means by the University.

4. Defendant objects to Plaintiffs' definition of "Master Digital Copy" and to each Interrogatory including that term on the ground that they presume the existence of certain digital copies that may not exist, or that may exist in the possession, custody, or control of third parties and without Defendant's, the University's, or the Library's knowledge. Defendant further objects to Plaintiffs' definition of "Master Digital Copy" and to each Interrogatory including that term to the extent that they seek information in the possession, custody, or control of third parties and not in the possession, custody, or control of Defendant, the University, or the Library. Defendant states that upon information and belief Google prepared a "Master Digital Copy" of each Work listed on Schedule A to Plaintiffs' Set of Interrogatories to Defendant Mary Sue Coleman ("Schedule A") based on Master Print Copies, but further information concerning such Master Digital Copies lies with third parties and is not in Defendant's possession, custody, or control.

5. Defendant objects to Plaintiffs' definitions of "Master University Copy," "Secondary University Copies," and "HathiTrust Digital Copies" and to each Interrogatory including those terms as vague and ambiguous and unnecessarily duplicative. Defendant states that four "HathiTrust Digital Copies" are maintained to store and preserve the digitized works in

the HathiTrust Digital Library (“HDL”), the shared repository of digital collections of institutions participating in the HathiTrust Service: (1) the “Initial HathiTrust Digital Copy” received from Google and incorporated into the HDL at the University, (2) the “Mirror Site HathiTrust Digital Copy,” (3) the “First Backup Tape HathiTrust Digital Copy,” and (4) the “Second Backup Tape HathiTrust Digital Copy.” The “Master University Copy,” as defined by Plaintiffs, is the same as the “Initial HathiTrust Digital Copy” defined above and will be referred to as such in Defendant’s responses. In addition, the only “Secondary University Copies” that exist are also “HathiTrust Digital Copies,” namely, the “Mirror Site HathiTrust Digital Copy,” the “First Backup Tape HathiTrust Digital Copy,” and the “Second Backup Tape HathiTrust Digital Copy” defined above.

6. Defendant objects to Plaintiffs’ definition of “Third Party Digital Copies” and to each Interrogatory including that term on the ground that they presume the existence of certain digital copies that may not exist, or that may exist in the possession, custody, or control of third parties and without Defendant’s, the University’s, or the Library’s knowledge. Defendant further objects to Plaintiff’s definition of “Third Party Digital Copies” and to each Interrogatory including that term as overly broad to the extent Plaintiffs’ definition includes digital copies created from the Master Digital Copy or digital copies thereof because, as described above, the Master Digital Copy and information concerning the Master Digital Copy are with third parties and are not in the possession, custody, or control of Defendant, the Library, or the University.

### **INSTRUCTIONS**

7. Defendant objects to Paragraph 1 of Plaintiffs’ “Instructions” to the extent 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, and Defendant disclaims any obligation to solicit information from any other parties in responding to the Interrogatories. Defendant further objects to this definition because it could potentially refer to hundreds 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. For each Work listed on Schedule A, separately identify the total number of (i) print and (ii) digital copies the Library created of each Master Print Copy it owns.

RESPONSE: Defendant objects to Interrogatory No. 1 on the ground that it is vague and ambiguous in that it requests information 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 February 8, 2012, the Library has not created any print or digital copies from a Master Print Copy of any Work listed on Schedule A. Defendant further responds that the Library prepared for shipment to one of Google's scanning centers a Master Print Copy of each Work listed in Schedule A and, upon information and belief, Google prepared one or more digital copies of each Work listed on Schedule A based on Master Print Copies.

2. For each Master Print Copy of a Work listed on Schedule A that the University caused to be digitized, (i) describe the method by which the Library selected, identified, collected and transported the Master Print Copy for digitization, and (ii) identify the individuals (a) who directed or performed each of the foregoing actions, and (b) to whom the Master Print Copy was delivered for digitization.

RESPONSE: Defendant objects to Interrogatory No. 2 on the ground that it is vague and ambiguous in that “caused to be digitized” is not defined and the meaning of this phrase is not clear in the context of the Interrogatory. Defendant further objects to Interrogatory No. 2 to the extent it seeks the identity of individuals who directed or performed actions that were not directed or performed by Defendant, the University, or the Library. Subject to the foregoing general and specific objections, and without waiving the same, Defendant responds as follows:

(i) In certain instances, the Library collected works for digitization shelf by shelf, selecting every work on each shelf, including the following Works listed on Schedule A:

Trond Andreassen, *Bok-Norge: en litteratursosiologisk oversikt* (Universitetsforlaget)  
Pat Cummings, *Talking With Artists: Volume 1* (Bradbury Press)  
Pat Cummings, *Talking With Artists: Volume 2* (Simon & Schuster Books for Young Readers)  
Angelo Loukakis, *Vernacular Dreams* (University of Queensland Press)  
Roxana Robinson, *Summer light* (Viking)  
Roxana Robinson, *Georgia O'Keeffe : a life* (Harper & Row)  
Roxana Robinson, *A glimpse of scarlet and other stories* (E. Burlingame Books)  
Roxana Robinson, *A glimpse of scarlet and other stories* (HarperPerennial)  
Roxana Robinson, *Asking for love and other stories* (Random House)  
Roxana Robinson, *Sweetwater : a novel* (Random House)  
Roxana Robinson, *A perfect stranger: and other stories* (Random House)  
André Roy Marguerite, *Duras à Montréal* (Spirale)  
J.R. Salamanca, *Southern light : a novel* (Knopf)  
J.R. Salamanca, *Embarkation* (Knopf)  
J.R. Salamanca, *The lost country: a novel* (Simon & Schuster)  
J.R. Salamanca, *A sea change* (Knopf)  
J.R. Salamanca, *That summer's trance : a novel* (Welcome Rain)  
J.R. Salamanca, *Lilith* (Simon & Schuster)  
James Shapiro, *Oberammergau* (Pantheon Books)  
T.J. Stiles, *Jesse James : last rebel of the Civil War* (A.A. Knopf)  
Fay Weldon, *Watching me, watching you* (Summit Books)  
Fay Weldon, *Praxis : a novel* (Summit Books)  
Fay Weldon, *Puffball : a novel* (Summit Books)  
Fay Weldon, *Remember me* (Random House)  
Fay Weldon, *The heart of the country* (Hutchinson)  
Fay Weldon, *The hearts and lives of men* (Heinemann)  
Fay Weldon, *The rules of life* (Hutchinson)  
Fay Weldon, *The Shrapnel Academy* (Viking)  
Fay Weldon, *The heart of the country* (Viking)

Fay Weldon, *Sacred cows* (Chatto & Windus)  
Fay Weldon, *The fat woman's joke* (Academy Chicago)  
Fay Weldon, *The cloning of Joanna May Collins*  
Fay Weldon, *Little sisters* (Chivers Press)  
Fay Weldon, *Darcy's utopia* (Collins)  
Fay Weldon, *The cloning of Joanna May* (Penguin Books)  
Fay Weldon, *Moon over Minneapolis/Why she couldn't stay* (HarperCollins)  
Fay Weldon, *Life force* (Viking)  
Fay Weldon, *Growing rich* (HarperCollins)  
Fay Weldon, *Life force* (HarperCollins)  
Fay Weldon, *Trouble* (Penguin Books)  
Fay Weldon, *Affliction* (HarperCollins)  
Fay Weldon, *Splitting* (Flamingo)  
Fay Weldon, *Leader of the band* (Penguin Books)  
Fay Weldon, *Growing rich* (Flamingo)  
Fay Weldon, *The hearts and lives of men* (Flamingo)  
Fay Weldon, *A hard time to be a father: a collection of short Stories* (Flamingo)  
Fay Weldon, *Life force* (HarperCollins)  
Fay Weldon, *Nothing to wear and nowhere to hide: stories* (Flamingo)  
Fay Weldon, *Big women* (Flamingo)  
Fay Weldon, *Godless in Eden : a book of essays* (Flamingo)  
Fay Weldon, *Rhode Island blues* (Flamingo)  
Fay Weldon, *The Bulgari connection* (Flamingo)  
Fay Weldon, *Auto da fay* (Flamingo)  
Fay Weldon, *Flood warning : a play* (Samuel French)  
Fay Weldon, *Wicked women : stories* (The Atlantic Monthly Press)  
Fay Weldon, *Mantrapped* (Fourth Estate)  
Fay Weldon, *She may not leave* (Fourth Estate)  
Fay Weldon, *The spa decameron* (Quercus)

In other instances, Google Inc. (“Google”) provided the Library with a list of candidate works for digitization, which included the following Works listed on Schedule A:

Pat Cummings, *C.L.O.U.D.S.* (Lothrop, Lee & Shepard Books)  
Pat Cummings, *Clean Your Room, Harvey Moon!* (Bradbury Press)  
Pat Cummings, *Jimmy Lee Did It* (Lothrop, Lee & Shepard Books)  
Fay Weldon, *Wicked women : stories* (The Atlantic Monthly Press)

The Library’s staff retrieved the Master Print Copy of each Work listed in Schedule A and prepared them for shipment to one of Google’s scanning centers. Google arranged for transportation of the Master Print Copies from, and back to, the Library.

(ii) (a) For each of the foregoing actions that was directed or performed by the Library, the individuals who were primarily responsible for such actions are Susan Wooding, Operations Manager/Hatcher-Shapiro Access Unit; Geoffrey Stoll, Information Resources Intermediate Supervisor; Anne Karle-Zenith and Julia Lovett, Special Project Librarians; and Library stacks employees Maureen Hoyi, Alan Steele, and Adam McDermott. For each of the foregoing actions that was directed or performed by Google, the individual who was primarily responsible for such actions is, upon information and belief, Ben Bunnell, Google Project Manager.

(b) A Master Print Copy of each Work on Schedule A was delivered to Google for digitization.

3. For each Work listed on Schedule A, provide the following information with regard to the Master Digital Copy, Master University Copy and all Secondary University Copies, 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. 3 on the ground that it presumes the existence of certain digital copies that may not exist, or that may exist in the possession, custody, or control of third parties and without Defendant's, the University's, or the Library's knowledge. Defendant further objects to Interrogatory No. 3 to the extent that it seeks information in the possession, custody, or control of third parties and not in the possession, custody, or control of Defendant, the University, or the Library. Defendant further objects to Interrogatory No. 3 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. 3 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. 3 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. 3 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. 3 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, upon information and belief, Google prepared a Master Digital Copy of each Work listed on Schedule A based on Master Print Copies, but further information concerning such Master Digital Copies lies with third parties and is not in Defendant's possession, custody, or control. Defendant further responds that no Third Party Digital Copies have been created from the HathiTrust Digital Copies of any Work listed on Schedule A, and 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 the University, (2) the "Mirror Site HathiTrust Digital Copy," (3) the "First Backup Tape HathiTrust Digital Copy," and (4) the "Second Backup Tape HathiTrust Digital Copy." In addition, the "Master University Copy," as defined by Plaintiffs, is the same as the Initial HathiTrust Digital Copy defined above and will be referred to as such in Defendant's responses. Moreover, the only "Secondary University Copies" that exist are HathiTrust Digital Copies, namely, the Mirror Site HathiTrust Digital Copy, the First Backup Tape HathiTrust Digital Copy, and the Second Backup Tape HathiTrust Digital Copy defined above.

With respect to the Master Digital Copy and the 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 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 Master Digital Copy and the HathiTrust Digital Copies for each of the Works listed on Schedule A.

	<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<b>(c) the identity of the source of the digital copy;</b>	On information and belief, the Master Print Copies	Google Return Interface	The Initial HathiTrust Digital Copy	The Initial HathiTrust Digital Copy	The First Backup Tape HathiTrust Digital Copy
<b>(d) a description of the equipment and method used to create the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	Google Return Interface.	Isilon SyncIQ	Tivoli Storage Manager backup	Internal Tivoli Storage Manager replication
<b>(e) a description of the means by which the digital copy was transferred from its source;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	Google Return Interface.	Isilon SyncIQ	Tivoli Storage Manager backup protocol	Tivoli Storage Manager backup protocol
<b>(f) the type of media (e.g., DVD, flash drive, internal/external hard drive, tape backup, etc.) on which the digital copy is stored;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	Isilon Network Attached Storage	Isilon Network Attached Storage	Encrypted tape	Encrypted tape
<b>(g) the identity of any computer system connected to media on which the digital copy is stored;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	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 University of Michigan Information Technology Services Tivoli Storage Manager servers located at the Michigan Academic Computing Center	Four University of Michigan Information Technology Services Tivoli Storage Manager servers located at the Arbor Lakes Data Facility
<b>(h) the identity of any computer</b>	Such information is not in Defendant's, the	The HathiTrust private	The HathiTrust private	The University of Michigan	The University of Michigan

<b>network to which a device storing the digital copy is connected;</b>	University's, or the Library's possession, custody, or control.	computer network and the University of Michigan campus computer network	computer network and the Indiana University – Purdue University Indianapolis campus computer network	campus computer network	campus computer network
<b>(i) the Physical Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	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 Master Digital Copy and the HathiTrust Digital Copies for each of the Works listed on Schedule A. All individuals identified as employees of the University may be contacted through Defendants' counsel.

<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
Upon information and belief, Google prepared a Master Digital Copy of each Work listed on Schedule A based on Master Print Copies, but further information concerning such Master Digital Copies, including the identities of the individual(s) at Google who authorized, directed, supervised, facilitated, and/or participated in the	By entering the December 14, 2004 Cooperative Agreement with Google, the Regents of the University of Michigan/University 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	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,	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,	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,



<p>creation of the Master Digital Copies, is not in Defendant's, the University's, or the Library's possession, custody, or control.</p> <p>By entering the December 14, 2004 Cooperative Agreement with Google, the Regents of the University of Michigan/University Library, Ann Arbor Campus authorized the creation of the Master Digital Copy.</p>	<p>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>were primarily responsible for the creation of the Mirror Site HathiTrust Digital Copy using Isilon SyncIQ.</p>	<p>were primarily responsible for the creation of the First Backup Tape HathiTrust Digital Copy using Tivoli Storage Backup manager.</p>	<p>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 Master Digital Copy and the HathiTrust Digital Copies for each of the Works listed on Schedule A as of February 1, 2012. All individuals identified as employees of the University, the University of Wisconsin, or Indiana University may be contacted through Defendants' counsel.

<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<p>Upon information and belief, Google prepared a Master Digital Copy of each Work</p>	<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</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</p>	<p>Mike Garrison, Cameron Hanover, Phil Jessel, David Nowell, and Steve</p>	<p>Mike Garrison, Cameron Hanover, Phil Jessel, David Nowell, and Steve</p>

<p>listed on Schedule A based on Master Print Copies, but further information concerning such Master Digital Copies, including the identities of the individual(s) who have authorized access to the Physical Location of the Master Digital Copies, is not in Defendant's, the University's, or the Library's possession, custody, or control.</p>	<p>the Physical Location of the Initial HathiTrust Digital Copy.</p>	<p>Programmers, University of Michigan Library, are authorized for certain access to the Physical Location of the Mirror Site HathiTrust Digital Copy.</p>	<p>Simmons, who are Tivoli Storage Manager Administrators, University of Michigan Information Technology Services, are authorized for certain access to the Physical Location of the First Backup Tape HathiTrust Digital Copy.</p>	<p>Simmons, who are Tivoli Storage Manager Administrators, University of Michigan Information Technology Services, are authorized for certain access to the Physical Location of the Second Backup Tape HathiTrust Digital Copy.</p>
<p>Upon information and belief, Google prepared a Master Digital Copy of each Work listed on Schedule A based on Master Print Copies, but further information concerning such Master Digital Copies, including the</p>	<p>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,</p>	<p>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</p>	<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 Virtual</p>	<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 Virtual</p>

<p>identities of the individual(s) who have authorized access to the Virtual Location of the Master Digital Copies, is not in Defendant's, the University's, or the Library's possession, custody, or control.</p>	<p>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 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</p>	<p>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 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</p>	<p>Location of the First Backup Tape HathiTrust Digital Copy.</p>	<p>Location of the Second Backup Tape HathiTrust Digital Copy.</p>
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	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.	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.		
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4. Identify the number of books the University contributed to HathiTrust and the estimated number of those books the University believes are protected by copyright.

RESPONSE: Defendant objects to Interrogatory No. 4 on the ground that the phrase “books the University contributed” is not defined and the meaning of such phrase is not clear in the context of the Interrogatory. Subject to the foregoing general and specific objections, and without waiving the same, Defendant responds that the University has contributed no “books” to HathiTrust. Defendant further responds that, as of December 20, 2011, the University, through its Library, had incorporated into the HathiTrust Digital Library 4,490,155 digitized volumes; the Library does not currently have an estimate of the number of such works that are protected by copyright under the United States Copyright Act, as the Library's efforts to determine the copyright status of works in the HathiTrust Digital Library are ongoing.

5. Describe in detail the process followed by the University between May 16, 2011 and September 16, 2011 in connection with the Orphan Works Project to determine whether a work would be designated as an “orphan candidate.”

RESPONSE: Subject to the foregoing general objections and without waiving the same, Defendant responds that the process followed by the University and the Library between May 16, 2011 and September 16, 2011 in connection with the “Orphan Works Project” (an initiative to, *inter alia*, identify “orphan works,” in-copyright works for which the copyright holder cannot be found (“OWP”)) to determine whether a work would be designated as an “orphan works candidate” (which, after further investigation, the Library may have decided to make available to certain users of the HathiTrust Service on a limited basis) included the steps described below (the “Initial OWP Process”). During the period from May 16, 2011 to September 16, 2011, the Initial OWP Process was continually being evaluated and adjusted based on information acquired and analyzed through the Initial OWP Process.

(1) The Library began its review of works under the Initial OWP Process on or about May 16, 2011. The works reviewed in the Initial OWP Process were works that were determined to be in-copyright by the University and the Library’s Copyright Review Management System. Works reviewed in the Initial OWP Process were reviewed by Orphan Works Investigators (“OWIs”) who were hired and trained specifically to conduct the OWP research.

(2) To begin their review of each work, OWIs were provided with information concerning the work including but not limited to bibliographic data.

(3) After verifying the bibliographic data, the OWI conducted searches for the work on Amazon.com and, in certain circumstances, Bookfinder.com to determine whether the work was available in print and unused. If, through these searches, the OWI identified the work available in print, he or she stopped review of the work; if the OWI identified the work as not available in print, he or she continued to the next step of the review.

(4) The purpose of the next step in the OWI's review was to determine whether a rights holder for the work could be located, beginning with research regarding the work's publisher. If, through his or her research, the OWI identified contact information for the publisher, he or she noted the contact information in the shared spreadsheets and stopped review of the work; if the OWI could not identify contact information for the publisher, the OWI noted this fact on the shared spreadsheets and continued to the next step of the review process.

(5) If no contact information could be identified for the work's publisher, the OWI began to research authors, copyright renewers, and other potential rights holders for the work, such as copyright holders listed on the title page verso and other leads identified during research. If the OWI was able to identify email or telephone contact information for a potential rights holder, the OWI would record the contact information, and stop his or her review of the work. If the OWI was unable to identify email or telephone contact information for a potential rights holder, the OWI coded the work as a potential orphan works candidate.

(6) Once the primary review was completed for a particular work, a secondary, blind review was undertaken by a different OWI. If the final codes entered for the primary and secondary review matched, then the work either became an orphan works candidate or did not as indicated by the coding. If the final codes of the primary and secondary review did not match, a conflict, or third, review was conducted.

(7) The bibliographic information for works identified as orphan works candidates were posted on the HathiTrust service website (and also could be viewed on the Library website). The first list of bibliographic information for orphan work candidates was posted on the HathiTrust service website on or about July 15, 2011. The bibliographic information for these candidates, and others subsequently added, were intended to be publicly posted for ninety days as a further

effort to identify the rights holders of the works. If the rights holder for one of the orphan work candidates identified him/herself, or even if a third party brought forward information leading to a link between a work and a rights holder, the work was removed from the list of candidates and from the OWP. (Indeed, if a copyright holder were identified at any time—even after the expiration of the planned ninety-day period—the copyright holder’s work would have been removed from the OWP, consistent with the OWP’s purpose to identify and provide certain access only to genuine orphan works.)

(8) On September 16, 2011, before the expiration of the ninety-day online posting period of the bibliographic information for the first set of orphan works candidates, and before any works were made available through the OWP, the Library withdrew from the “HathiTrust Digital Library – Orphan works candidates” webpage the bibliographic information for the initial list of orphan works candidates and issued a statement that it had “begun an examination of [its] procedures” to “create a more robust, transparent, and fully documented process.”

6. Identify the individual(s) who authorized, directed, supervised, facilitated and/or participated in the Orphan Works Project between May 16, 2011 and September 16, 2011, including each such individual’s name and current address, as well as his or her employer (at the time the individual was involved with the Orphan Works Project), job title and role in the Orphan Works Project.

RESPONSE: Defendant objects to Interrogatory No. 6 on the ground that the terms “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. 6 as overly broad and unduly burdensome to the extent it seeks the current address of individuals who were employed by the UM at the time the individual was involved with the Initial OWP Process but who are no longer employed by UM or involved with the OWP Project. Subject to the foregoing general and specific objections and without waiving the same,

Defendant responds that the following individuals were primarily responsible for the direction, supervision, and facilitation of the Initial OWP Process between May 16, 2011 and September 16, 2011. All of the individuals who are currently employed by UM may be contacted through Defendants' counsel.

John Wilkin, Associate University Librarian and Executive Director of the HathiTrust, University of Michigan	Authorized and supervised the Initial OWP Process.
Melissa Levine, Lead Copyright Officer, University of Michigan	Supervised and participated in the design of the Initial OWP Process as the head of the Library's Copyright Office.
Greg Grossmeier, Copyright Specialist, University of Michigan	Supervised and participated in the design of the Initial OWP Process and project tools as the OWP Project Administrator until August 2011.
Julia Lovett, Special Projects Librarian, University of Michigan	Supervised and participated in the design and implementation of the Initial OWP Process and project tools as the OWP Project Administrator beginning in late August 2011
Benjamin Tobey, Senior Orphan Works Investigator, University of Michigan	Conducted copyright research as an OWI under the Initial OWP Process and served in a technical role in organizing research results.
Lisa Hardman, Orphan Works Investigator, University of Michigan	Conducted copyright research as an OWI under the Initial OWP Process.
Melvin Whitehead, Orphan Works Investigator, University of Michigan	Conducted copyright research as an OWI under the Initial OWP Process.
Bobby Glushko, Copyright Specialist, University of Michigan	Periodic assistance with OWP project management from August 10, 2011 to early September 2011.

DATED: February 8, 2012

Respectfully Submitted,



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Joseph M. Beck (admitted *pro hac vice*)  
W. Andrew Pequignot (admitted *pro hac vice*)  
Allison Scott Roach (admitted *pro hac vice*)  
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Telephone: (404) 815-6500  
Facsimile: (404) 815-6555  
Email: jbeck@kilpatricktownsend.com

*Attorneys for Defendants*

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<i>Bok-Norge : en litteratursosiologisk oversikt</i> by Trond Andreassen						
	<b>(b) the date the digital copy was created;</b>	On information and belief, August 10, 2007	October 25, 2007	December 1, 2008	November 13, 2008	November 13, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>C.L.O.U.D.S.</i> by Pat Cummings						
	<b>(b) the date the digital copy was created;</b>	On information and belief, August 28, 2009	October 9, 2009	October 9, 2009	October 10, 2009	October 10, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, December 15, 2010	January 6, 2011	January 6, 2011	January 7, 2011	January 7, 2011

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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
<i>Clean Your Room, Harvey Moon!</i> by Pat Cummings						
	<b>(b) the date the digital copy was created;</b>	On information and belief, December 15, 2010	January 6, 2011	January 6, 2011	January 6, 2011	January 6, 2011
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, December 13, 2010	January 19, 2011	January 19, 2011	January 20, 2011	January 20, 2011
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

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<i>Talking With Artists: Volume 1</i> by Pat Cummings						
	<b>(b) the date the digital copy was created;</b>	On information and belief, August 31, 2009	September 7, 2009	September 7, 2009	September 8, 2009	September 8, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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
<i>Talking With Artists: Volume 2</i> by Pat Cummings						
	<b>(b) the date the digital copy was created;</b>	On information and belief, August 31, 2009	September 30, 2009	September 30, 2009	October 4, 2009	October 4, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>Vernacular Dreams</i> by Angelo Loukakis						
	<b>(b) the date the digital copy was created;</b>	On information and belief, September 11, 2006	April 8, 2009	April 8, 2009	April 9, 2009	April 9, 2009

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>Summer light</i> by Roxana Robinson						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 12, 2008	May 31, 2008	December 10, 2008	November 28, 2008	November 28, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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
<i>Georgia O'Keeffe: a life</i> by Roxana Robinson						
	<b>(b) the date the digital copy was created;</b>	On information and belief, November 12, 2007	January 26, 2008	December 10, 2008	November 26, 2008	November 26, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman  
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<i>A glimpse of scarlet and other stories</i> by Roxana Robinson						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 12, 2008	November 11, 2009	November 11, 2009	November 11, 2009	November 11, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>A glimpse of scarlet and other stories</i> by Roxana Robinson						
	<b>(b) the date the digital copy was created;</b>	On information and belief, January 20, 2010	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 12, 2008	May 31, 2008	December 10, 2008	October 26, 2008	October 26, 2008

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 17, 2008	July 19, 2008	December 10, 2008	November 20, 2008	November 20, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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						
	<b>(b) the date the digital copy was created;</b>	On information and belief, May 29, 2008	September 23, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman  
Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<i>Marguerite Duras à Montréal</i> by André Roy						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 25, 2008	October 20, 2008	December 10, 2008	October 29, 2008	October 29, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>Southern light : a novel</i> by J.R. Salamanca						
	<b>(b) the date the digital copy was created;</b>	On information and belief, June 27, 2006	April 9, 2009	April 9, 2009	April 9, 2009	April 9, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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
<i>Embarkation</i> by J.R. Salamanca						
	<b>(b) the date the digital copy was created;</b>	On information and belief, June 27, 2006	March 25, 2009	March 25, 2009	March 26, 2009	March 26, 2009



**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, June 27, 2006	April 3, 2009	April 3, 2009	April 3, 2009	April 3, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, September 20, 2007	August 14, 2008	December 10, 2008	October 14, 2008	October 14, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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 Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<i>That summer's trance : a novel</i> by J.R. Salamanca						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 12, 2008	October 31, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 12, 2008	May 22, 2008	December 10, 2008	December 5, 2008	December 5, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>Oberammergau</i> by James Shapiro						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 20, 2008	October 24, 2008	December 10, 2008	October 31, 2008	October 31, 2008

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>Jesse James : last rebel of the Civil War</i> by T.J. Stiles						
	<b>(b) the date the digital copy was created;</b>	On information and belief, September 23, 2008	January 5, 2009	January 5, 2009	January 5, 2009	January 5, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	December 2, 2008	December 2, 2008	December 3, 2008	December 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
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<i>Praxis : a novel</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	October 27, 2008	December 10, 2008	October 28, 2008	October 28, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	December 6, 2008	December 6, 2008

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

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<i>The rules of life</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 17, 2008	November 17, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>The Shrapnel Academy</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 21, 2006	October 11, 2009	October 11, 2009	October 13, 2009	October 13, 2009

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	June 15, 2009	June 15, 2009	June 18, 2009	June 18, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	July 19, 2008	December 10, 2008	November 29, 2008	November 29, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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						

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**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, January 2, 2007	May 9, 2007	December 10, 2008	November 26, 2008	November 26, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	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 Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, January 20, 2010	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 3, 2008	November 3, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<i>Life force</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>Growing rich</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	February 14, 2009	February 14, 2009	February 14, 2009	February 14, 2009

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, January 20, 2010	January 27, 2010	January 27, 2010	January 29, 2010	January 29, 2010
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 12, 2008	November 12, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>Splitting</i> by Fay Weldon						

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

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	<b>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	November 3, 2009	November 3, 2009	November 4, 2009	November 4, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.z ip
<i>Wicked women : stories</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, August 17, 2010	October 31, 2010	October 3, 2010	November 4, 2010	November 4, 2010
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.z ip
<i>Leader of the band</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	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 Mary Sue Coleman**  
**Interrogatory No. 3**

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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 18, 2008	November 18, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 18, 2008	November 18, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
<i>A hard time to be a father: a collection of short stories</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 1, 2008	November 1, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	July 19, 2008	December 10, 2008	November 10, 2008	November 10, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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						

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
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<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	November 1, 2008	November 1, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 29, 2008	November 29, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	October 31, 2008	December 10, 2008	October 31, 2008	October 31, 2008

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman  
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	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	October 27, 2008	December 10, 2008	October 31, 2008	October 31, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 13, 2008	July 19, 2008	December 10, 2008	November 17, 2008	November 17, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.zip
<i>Auto da fay</i> by Fay Weldon						



**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
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<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(b) the date the digital copy was created;</b>	On information and belief, March 18, 2008	November 11, 2009	November 11, 2009	November 12, 2009	November 12, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, March 3, 2008	July 10, 2009	July 10, 2009	July 10, 2009	July 10, 2009
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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>(b) the date the digital copy was created;</b>	On information and belief, January 20, 2010	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 Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, May 28, 2008	September 21, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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</i> by Fay Weldon						
	<b>(b) the date the digital copy was created;</b>	On information and belief, May 29, 2008	October 2, 2008	December 10, 2008	December 18, 2008	December 18, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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</i> by Fay Weldon						

**Exhibit A to Responses to Plaintiff's First Set of Interrogatories to Defendant Mary Sue Coleman**  
**Interrogatory No. 3**

<b>(a) the title and author of the Work;</b>		<b>Master Digital Copy</b>	<b>Initial HathiTrust Digital Copy</b>	<b>Mirror Site HathiTrust Digital Copy</b>	<b>First Backup Tape HathiTrust Digital Copy</b>	<b>Second Backup Tape HathiTrust Digital Copy</b>
	<b>(b) the date the digital copy was created;</b>	On information and belief, May 28, 2008	September 22, 2008	December 10, 2008	December 19, 2008	December 19, 2008
	<b>(j) the Virtual Location of the digital copy;</b>	Such information is not in Defendant's, the University's, or the Library's possession, custody, or control.	/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.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 (the "University").
2. All of the information provided in the attached Responses to Plaintiffs' First Set of Interrogatories to Defendant Mary Sue Coleman has been gathered from various employees of the University.
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 8<sup>th</sup> day of February, 2012.



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Paul N. Courant