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21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA  
 23 SAN FRANCISCO DIVISION

24 ORACLE AMERICA, INC.  
 Plaintiff,  
 25 v.  
 26 GOOGLE INC.  
 Defendant.

Case No. CV 10-03561 WHA  
**ORACLE'S RESPONSE RE ECF NO.  
 1573**  
 Dept.: Courtroom 8, 19th Floor  
 Judge: Honorable William H. Alsup

1 Oracle shares the Court’s respect for jurors and their privacy including the concern, as  
2 expressed in the Court’s March 25, 2016 “Order Re Internet And Social Media Searches”  
3 (“Order”) that “prospective jurors are likely to wonder whether Google will be mining the  
4 histories of Internet searches by the venire persons to determine their interests...” ECF No. 1573  
5 at 6. Oracle thus originally proposed limitations on Internet research that it believed were  
6 consistent with the law, admittedly in an area of the law that, as the Court points out, is emerging  
7 and developing. *Id.* at 7, 10.

8 Oracle consents to the Court’s proposed ban on all juror research, including Internet and  
9 social media research and research using proprietary sources of information, on the venire or the  
10 empaneled jury until the trial is over. Regarding the Court’s willingness to provide an  
11 enlargement of time for counsel to conduct extra voir dire themselves (Order at 5), Oracle  
12 respectfully requests at least one hour of attorney voir dire per side subject to enlargement for  
13 good cause. Oracle reserves its rights under Federal Rules of Civil Procedure 59, 60 and the  
14 Constitution in the very unlikely event that juror misconduct is discovered after trial.

15 Dated: March 31, 2016

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