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**VIA ELECTRONIC MAIL**

L. Roman Rachuba II  
Sughrue Mion, LPPC  
2000 Pennsylvania Avenue, NW  
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Re: The Boeing Company v. The Regents of the University of California- IPR2024-00761

Dear Counsel:

As you are aware, this firm represents LaTonya Morris ("Morris") at ProQuest LLC ("ProQuest") with respect to the subpoena for testimony issued by the United States District Court for the Eastern District of Michigan and served on Morris on December 3, 2024 (the "Subpoena") by The Regents of the University of California ("Patent Owner") in the matter of *The Boeing Company v. The Regents of the University of California*, IPR2024-00761 (the "Matter"). Pursuant to Federal Rule of Civil Procedure 45, non-party Morris serves the following objections to the Subpoena and the topics contained herein.

Should you wish to meet and confer regarding Morris's objections to the Subpoena, please do not hesitate to contact me at [thatcher.rahmeier@faegredrinker.com](mailto:thatcher.rahmeier@faegredrinker.com) or 302-467-4211.

**GENERAL OBJECTIONS**

Morris makes the following General Objections, which are hereby incorporated in and made a part of each of the specific responses to the topics set forth below:

1. Morris does not waive any objection that may be applicable to: (a) the use, for any purpose, by the parties in the Matter, of any testimony given in response to the Subpoena; or (b) the admissibility, relevance, or materiality of any of the testimony given in response to questions about any issue in the Matter.

2. Morris objects to the Subpoena to the extent information or testimony is sought that is outside the confines of her personal knowledge. Morris further objects to the extent Patent Owner seeks to treat Morris's deposition as a FRCP 30(b)(6) deposition.

3. Morris objects to the Subpoena to the extent the parties intend to record her testimony via audiovisual means as the Subpoena is vague as to the method for recording as required by FRCP 30(b)(3)(A).

4. Morris objects to the Subpoena to the extent it seeks information or testimony protected by the attorney-client privilege, common interest privilege, and/or work product protection. Morris shall not testify to such information and any inadvertent disclosure thereof shall not be deemed a waiver of any privilege or protection with respect to such information.

5. Morris objects on the basis that many of the topics in the Subpoena are vague and ambiguous and necessarily require Morris to interpret the Subpoena.

6. Morris objects to the Subpoena to the extent it seeks information or testimony not relevant to the subject matter of the Matter or not proportional to the needs of the Matter, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Federal Rule of Civil Procedure 26(b)(1).

7. Morris objects to the Subpoena to the extent it seeks information or testimony from Morris that contain or otherwise reveal any trade secrets, or other confidential or proprietary business or financial information protected from disclosure under any common law or statutory protection, including privacy statutes and regulations.

8. Morris objects to the Subpoena to the extent it seeks to impose duties upon Morris beyond those permitted under the Federal Rules of Civil Procedure.

9. Morris also objects to the topics as overbroad, and unduly burdensome, and failing to provide particularity.

10. Morris objects to the Subpoena to the extent it seeks information in the possession of persons or entities other than Morris, or otherwise outside of the possession, custody, and control of Morris.

By setting forth specific objections to any particular Subpoena topics, Morris does not limit the general objections set forth above and reserves any and all objections.

### **SPECIFIC OBJECTIONS TO SUBPOENA TOPICS**

1. Your declaration, dated March 15, 2024, which was presented in United States Patent and Trademark office *Inter Parties* Review Proceeding IPR2024-00761 on behalf of The Boeing Company as Boeing Ex. 1035, including all attachments thereto (collectively, "Morris Declaration").

**RESPONSE:** Morris incorporates herein her General Objections. Subject to and without waiving its General Objections, Morris agrees to testify generally about the Morris Declaration, and any amended declarations, via videoconference, for up to four hours of cross-examination and a half hour of re-direct examination.

2. The past and current policies, procedures, and practices of ProQuest LLC related to collection, organization, publication, and distribution for sale of content, including dissertations and master's theses.

**RESPONSE:** Morris incorporates herein her General Objections. Morris further objects that this topic is vague and fails to describe with reasonable particularity each item or category sought by the topic such that it would encompass information that would be irrelevant and unjustly expensive and time-consuming for a non-party to prepare to testify in response to category no. 2, especially because the topic does not specify a time period reasonably related to the claims and issues in the Matter or limit the topic to the issue in the Matter.

3. ProQuest's collection, organization, publication, and distribution for sale of Dissertation No. 3070468, entitled "Thin-film adhesion measurement by laser-induced stress waves," by Junlan Wang.

**RESPONSE:** Morris incorporates herein her General Objections. Morris further objects that this topic would be unjustly expensive and time-consuming for a non-party to prepare to testify in response to category no. 3 and does not specify a time period reasonably related to the claims and issues in the Matter. Furthermore, Morris objects to the extent that testimony sought seeks information that is considered confidential or proprietary business or financial information protected from disclosure.

4. Your employment by ProQuest LLC, including your job description and duties and responsibilities as a Technical Support Team Leader.

**RESPONSE:** Morris incorporates herein her General Objections. Morris further objects to the extent this topic is not related to the claims or defenses in the Matter.

5. All documents and things made in connection with the preparation of the Morris Declaration, including correspondence with counsel for Petitioner, The Boeing Company.

**RESPONSE:** Morris incorporates herein her General Objections. Morris further objects that this topic as vague and fails to describe with reasonable particularity the information sought by the topic such that it would encompass information that would be irrelevant and unjustly expensive and time-consuming for a non-party to prepare to testify in response to category no. 5. Morris further objects that this topic seeks information or testimony that is protected by the attorney-client privilege or work-product doctrine.

6. All documents and things made in connection with your preparation for this deposition, including correspondence with counsel for Petitioner, The Boeing Company.

**RESPONSE:** Morris incorporates herein her General Objections. Morris further objects that this topic as vague and fails to describe with reasonable particularity the information sought by the topic such that it would encompass information that would be irrelevant and unjustly expensive and time-consuming for a non-party to prepare to testify in response to category no. 6. Morris further objects that this topic seeks information or testimony that is protected by the attorney-client privilege or work-product doctrine.

Very truly yours,

*/s/ Thatcher A. Rahmeier*

Thatcher A. Rahmeier

TAR/edp

cc: Elizabeth Peterson- [Elizabeth.peterson@faegredrinker.com](mailto:Elizabeth.peterson@faegredrinker.com)