

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

S.M.R INNOVATIONS LTD and Y.M.R
TECH LTD,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:23-cv-479-DC

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF CATHERINE SPEVAK

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Catherine Spevak (who may be contacted through Defendant's counsel) on November 28, 2023, at 9:00 a.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: October 31, 2023

Respectfully submitted,

/s/ Cortney Alexander
Cortney Alexander
Kent & Risley LLC
5755 North Point Pkwy STE 57
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404-855-3867

cortneyalexander@kentrisley.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
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S.M.R INNOVATIONS LTD and Y.M.R
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Civil Action No. 6:23-cv-479-DC

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF ELENA LEYFMAN

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Elena Leyfman (who may be contacted through Defendant's counsel) on November 30, 2023, at 9:00 a.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: October 31, 2023

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

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FOR THE WESTERN DISTRICT OF TEXAS
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S.M.R INNOVATIONS LTD and Y.M.R
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APPLE INC.,

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Civil Action No. 6:23-cv-479-DC

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF JAMES SHIN

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of James Shin (who may be contacted through Defendant's counsel) on November 29, 2023, at 1:00 p.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: October 31, 2023

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

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JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF MARC LEE

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Marc Lee (who may be contacted through Defendant's counsel) on November 29, 2023, at 9:00 a.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: October 31, 2023

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

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Civil Action No. 6:23-cv-479-DC

JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF NICHOLAS CIRCOSTA

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Nicholas Circosta (who may be contacted through Defendant's counsel) on November 30, 2023, at 1:00 p.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: October 31, 2023

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
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S.M.R INNOVATIONS LTD and Y.M.R
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JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF VENUE-RELATED DEPOSITION OF APPLE INC.

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(6), counsel for Plaintiffs will take the deposition by oral examination of the corporate representative(s) of Apple Inc. (who may be contacted through Defendant's counsel) on December 1, 2023, at 9:00 a.m. Central time at 5800 Legends Lake Parkway, Waco, Texas 76712, or through a remote video deposition platform if agreed by the parties. The above-referenced corporate representative(s) shall appear to give testimony regarding the topics identified in Exhibit A, which is attached hereto.

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony (e.g., LiveNote), and will continue from day to day until completed.

Dated: November 3, 2023

Respectfully submitted,

/s/ Cortney Alexander

Cortney Alexander

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404-855-3867
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2023, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

EXHIBIT A

INSTRUCTIONS

1. The terms “You,” “Your,” “Defendant,” and “Apple” shall mean Apple Inc. and its subsidiaries, affiliates, and divisions, as well as its employees, attorneys, agents, representatives, and investigators, and any other person or entity acting on its behalf or under its control.

TOPICS

1. Defendant’s presence in the Western District of Texas, including the job titles, job descriptions, and locations of Defendant’s employees working in the Western District of Texas (including without limitation any organizational chart), Defendant’s office space or other facilities in the Western District of Texas, Defendant’s servers or data centers in the Western District of Texas, any tax breaks or credits Apple has received in connection with its presence or investment in Texas, and communications with anyone (including without limitation public officials, community groups, non-profit entities, media outlets) regarding Defendant’s operations, facilities, employees, offices, or growth plans in the Western District of Texas.

2. All persons, whether or not currently employed by Defendant, with work responsibility relating to the functionality of the Accused Instrumentalities identified in the claim charts included with Plaintiff’s First Amended Complaint, including without limitation those designing, developing, implementing, manufacturing, maintaining, testing, marketing, providing technical or customer support, licensing, or tracking finances relating to any of that functionality, including their title(s), job responsibilities, work location(s), residence location, and dates of employment.

3. The location of any and all documents concerning the functionality of the Accused Instrumentalities identified in the claim charts included with Plaintiff's First Amended Complaint (including without limitation documents relating to that functionality's design, development, source code, implementation, manufacture, maintenance, testing, marketing, technical or customer support, licensing, or finances).

4. The owner and location of servers, computers, or facilities storing such documents and the identity, job title, and work location of all persons having access to any of the documents referenced in Topic No. 3.

5. The percentage of Defendant's U.S. sales of Accused Instrumentalities that are sold in Texas.

6. Defendant's policies relating to document storage, including any policies relating to the storage of documents on an employee's personal device (e.g., computer) versus a shared repository.

7. Travel by any of Defendant's employees to Texas in connection with their work for Defendant.

8. Documents that Defendant has produced or filed, including any deposition testimony given, in any patent-related legal proceeding in Texas in the past six years in connection with any motion to dismiss for improper venue or motion for inter- or intra-district transfer.

9. Defendant's employees (past or present) who reside or regularly work in the state of Texas, including their title, job responsibilities, dates of employment, work address, and whether they have ever, in any way, done work related to the functionality of the Accused Instrumentalities identified in the claim charts included with Plaintiff's First Amended

Complaint, including without limitation designing, developing, implementing, manufacturing, maintaining, testing, marketing, providing technical or customer support, licensing, or tracking finances.

10. Defendant's document production in response to Plaintiffs' venue-related requests for production, including without limitation which documents produced by Defendant correspond to which document request.

11. Defendant's responses to Plaintiffs' venue-related interrogatories.

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JURY TRIAL DEMANDED

PLAINTIFFS' NOTICE OF DEPOSITION OF KAYLA CHRISTIE

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Kayla Christie (who may be contacted through Defendant's counsel) on June 11, 2024, at 10:00 a.m. Central time. The deposition will be conducted remotely via Remote Legal's remote-deposition platform ([Remote Depositions](#) | [Remote Court Reporting Services](#) | [Remote Legal](#)).

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony, and will continue from day to day until completed.

Dated: June 10, 2024

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2024, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander

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PLAINTIFFS' NOTICE OF DEPOSITION OF DR. NATHANIEL POLISH

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 30(b)(1), counsel for Plaintiffs will take the deposition by oral examination of Dr. Nathaniel Polish (who may be contacted through Defendant's counsel) on September 18, 2024, at 9:30 a.m. Central time. The deposition will be conducted remotely via Remote Legal's remote-deposition platform ([Remote Depositions](#) | [Remote Court Reporting Services](#) | [Remote Legal](#)).

The deposition will take place before a certified court reporter or other person authorized to administer oaths, will be recorded by audio, audiovisual, and/or stenographic means, and through the instant visual display of the testimony, and will continue from day to day until completed.

Dated: September 16, 2024

Respectfully submitted,

/s/ Cortney Alexander
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2024, I served the above document on counsel of record for Defendant via email.

/s/ Cortney S. Alexander