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13
14 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

15 JONATHAN E. JAFFE, an individual

16 Plaintiff,

17 v.

18 ADOBE, INC.
19 a Delaware corporation

20 Defendant.
21

Case No. 2:23-cv-06224-JWH-MAA

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO DEFENDANT'S CLAIM
CONSTRUCTION INTERROGATORIES**

JURY TRIAL DEMANDED

22 Plaintiff Jonathan E. Jaffe ("Plaintiff" or "Jaffe"), pursuant to N.D. Cal. Patent Local Rule
23 4-4 and Rules 26 and 33 of the Federal Rules of Civil Procedure, hereby objects and otherwise
24 responds to Defendant Adobe, Inc.'s ("Defendant") Claim Construction Interrogatories.

25 **GENERAL RESPONSES**

26 1. Plaintiff's response is made to the best of Plaintiff's present knowledge,
27 information, and belief based on information reasonably available to Plaintiff as of the date of
28 this response. Said response is at all times subject to such additional or different information that

1 claim construction discovery, further investigation, or the Court's claim construction order may
2 disclose. Plaintiff specifically reserves the right to supplement and amend these responses,
3 pursuant to Federal Rule of Civil Procedure 26(e) or otherwise, and, if necessary, to assert
4 additional objections arising from further investigation.

5 2. The specific responses set forth below are based upon Plaintiff's interpretation of
6 the language used in the Requests, and Plaintiff reserves its right to amend or supplement further
7 its response in the event that Defendant asserts an interpretation that differs from Plaintiff's
8 interpretation.

9 **GENERAL OBJECTIONS**

10 Plaintiff makes the following general objections, whether or not separately set forth in
11 response to each Request, to each instruction, definition, and Request.

12 1. Plaintiff objects to each Request to the extent it purports to require Plaintiff to do
13 anything beyond what is required of it by the Federal Rules of Civil Procedure, the Local Rules of
14 this Court, or other applicable law.

15 2. Plaintiff objects to each Request to the extent it seeks to require Plaintiff to offer
16 constructions of claim terms to which Plaintiff has stated that no construction is necessary.

17 3. Plaintiff objects to each Request to the extent it seeks to require Plaintiff to provide
18 its claim construction arguments and analysis prior to the Court's schedule for claim construction
19 briefing.

20 4. Plaintiff objects to each Request to the extent it is phrased in a manner that would
21 render it overly broad, vague, or ambiguous, or require subjective judgment or speculation on the
22 part of Plaintiff.

23 5. Plaintiff objects to Defendant's "Definitions" and "Instructions" to the extent they
24 seek to impose obligations beyond those permitted by the Federal Rules of Civil Procedure, the
25 Local Rules of this Court, or other applicable law.

26 6. These General Objections shall be deemed incorporated in full into each of the
27 individual responses set forth below.

28

CLAIM CONSTRUCTION INTERROGATORY NO. 1:

RESPONSE:

CLAIM CONSTRUCTION INTERROGATORY NO. 2:

RESPONSE:

CASE NO. 2:23-cv-06224-JWH-MAA
ADOBE – Exhibit 1024, page 3

1 further objects to this Interrogatory because it seeks to require Plaintiff to provide a construction
2 for a term for which Plaintiff has stated no construction is necessary.

3 Subject to the foregoing objections and to the extent Plaintiff can understand this
4 Interrogatory, Plaintiff responds as follows:

5 Plaintiff contends that the term “based on” means that the “second signature” is based on
6 the said data stream and said at least one parameter. The basis for Plaintiff’s contention is the
7 abstract of the ’828 Patent as well as 1:52-62; 10:40-45; 7:62-8:58; Fig. 7A; Fig. 9.

8 Plaintiff reserves the right to supplement or amend these Responses based on additional
9 claim construction discovery, the Court’s claim construction order, and investigation.

10
11 Dated: May 6, 2024

Respectfully submitted,

DICKINSON WRIGHT, PLLC

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13 By: /s/ Joshua G. Jones

14 Joshua G. Jones

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/s/ Joshua G. Jones
Joshua G. Jones