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

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| GOSECURE, INC.<br><br>Plaintiff,<br><br>v.<br><br>CROWDSTRIKE, INC., and<br>CROWDSTRIKE HOLDINGS, INC.<br><br>Defendants. | )<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>) | **Case No. 1:24-cv-00526-DII** |

**PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION TO CROWDSTRIKE (NOS. 1-59)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiff GoSecure, Inc. ("GoSecure" or "Plaintiff") requests that Defendants CrowdStrike, Inc. and CrowdStrike Holdings, Inc. (collectively, "CrowdStrike" or "Defendants") respond to these Requests for Production of Documents and things ("Requests") in writing, in accordance with the definitions and instructions contained herein, within thirty (30) days after service of the Requests. Plaintiff requests that CrowdStrike make any production of documents and things in connection with responses to these Requests at the office of Latham & Watkins LLP, 300 Colorado Street, Suite 2400, Austin, Texas 78701, or at such other time and place as the parties may agree upon.

**DEFINITIONS**

As used herein and in all further Requests, unless specified otherwise, the following definitions apply:

1. The "'872 Patent" means U.S. Patent No. 9,954,872—including any reexamination certificate and certificate of correction.



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2. The "'872 Patent Application" means U.S. Application No. 14/823,916, filed on August 11, 2015.

3. The "'872 Patent Publication" means US 2015/0381638 A1, published on December 31, 2015.

4. The "'697 Patent" means U.S. Patent No. 9,106,697—including any reexamination certificate and certificate of correction.

5. The "'697 Patent Application" means U.S. Application No. 13/163,590, filed on June 17, 2011.

6. The "'697 Patent Publication" means US 2011/0321166 A1, published on December 29, 2011.

7. References to this "action," "case," or "lawsuit," mean the above-captioned action.

8. "Accused Products" means and includes any system, method, product, component, and/or service made, used, sold, offered for sale, or imported by CrowdStrike that GoSecure contends infringes any Asserted Claim, including, but not limited to, the Falcon Platform, Falcon Endpoint Protection, Falcon Exposure Management, Falcon Insight XDR, Falcon ASPM, Threat Graph, Falcon Counter Adversary Operations, Falcon Next Gen SIEM, Falcon for Defender, Falcon Identity Protection, Falcon for IT, Falcon Foundry, Falcon Data Protection, Falcon Prevent, Falcon Firewall Management, Falcon Adversary OverWatch, Falcon Discover, Falcon Device Control, and Falcon Cloud Security, including prior versions and functionalities that are the same or essentially the same.

9. "Asserted Claim(s)" means each claim of the Asserted Patents that GoSecure asserts that CrowdStrike infringes, either directly or indirectly, literally or by the doctrine of equivalents.

10. The "Asserted Patents" means the '872 Patent and the '697 Patent, collectively, and any other patent that may be added to this litigation by GoSecure in amended pleadings. Any Request referring to an "Asserted Patent" seeks information as to each and every one of the Asserted Patents.

11. "Communicate" or "communication" means, without limitation, any manner or means of disclosure, transfer, transmission, conveyance, or exchange of information whether by written, oral, or other means (such as person-to-person, in a group, by telephone, letter, facsimile, electronic or computer mail, voicemail, telex, telecopy, or any other process, electric, electronic or otherwise).

12. "Complaint" refers to GoSecure's Complaint for Patent Infringement in this case, filed on May 16, 2024 (D.I. 1), and any subsequently filed amended complaints.

13. "CrowdStrike," "Defendant," "You," or "Your" means, collectively, CrowdStrike, Inc. and CrowdStrike Holdings, Inc. and all parents, subsidiaries, and affiliates thereof, all divisions, predecessors-in-interest, successors, and assigns of each of the foregoing, and all principals, officers, investors, employees, directors, agents, consultants, attorneys, and all other persons acting or purporting to act on behalf of or under the control of any of the foregoing.

14. "Date" means the exact day, month and year if so ascertainable or, if not, the best approximation (e.g., relationship to seasons or other events).

15. "Document" is synonymous in meaning and equal in scope to the usage of the term "documents or electronically stored information" in Rule 34(a)(l)(A) of the Federal Rules of Civil Procedure. A draft or non-identical copy is a separate document within the meaning of this term. By way of illustration, and without limitation, documents include at least the following: originals, drafts, and all non-identical copies of memoranda, reports, notes, graphs, laboratory notebooks, correspondence, interoffice communications, letters, diaries, calendars, photographs, motion

pictures, sketches, drawings, promotional material, technical papers, printed publications, patents, records, reports, and all other writings, as well as all non-paper information storage means such as sound reproductions, computer inputs and outputs, tape, film and computer memory devices, as well as tangible things such as models, modules, prototypes, and commercially saleable products.

16. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

17. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

18. "Facts" shall have its ordinary meaning and, pursuant to Federal Rule of Civil Procedure 33(a)(2), also shall mean related opinions, related contentions, and the application of law to fact.

19. The terms "identify," "identity," and "identification" shall mean, as the context shall make appropriate:

a. With respect to a person, the person's full name, present or last known address, telephone number, occupation, and employer. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person;

b. With respect to a document, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipient(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d);

c. With respect to a telephone conversation, the full name, occupation, telephone number, and address of each party to the telephone conversation, the date of the conversation, and the subject matter discussed;

d. With respect to an oral conversation other than a telephone conversation, the full name, occupation, telephone number, and address of each party to such conversation, the date of the conversation, and the subject matter discussed;

e. With respect to a corporation, partnership, association, or other entity, its full name, form of organization, present or last known address, and telephone number; and

f. With respect to any event or action, the dates or approximate dates thereof, a description of what occurred, and all persons involved.

20. "Infringe," "infringing," "infringed," or "infringement" means direct infringement, indirect infringement, contributory infringement, induced infringement, literal infringement and/or infringement under the doctrine of equivalents.

21. "Named Inventors" means the inventors named on the Asserted Patents, including Alen Capalik, David Andrews, and Ben Becker.

22. "Person" or "individual" means any natural person or any business, legal or government entity, or association-including, but not limited to, any proprietorship, partnership, firm, company, or corporation.

23. "Plaintiff" or "GoSecure" means GoSecure, Inc. and all parents, subsidiaries, and affiliates thereof, all divisions, predecessors-in-interest, successors, and assigns and the officers, directors, agents, representatives, employees, attorneys, and investigators, and others acting on their behalf.

24. "Prior Art" is used in these Requests in the same sense that it is used in 35 U.S.C. §§ 102 or 103 (pre-AIA) and includes without limitation, any patent, publication, physical device,

prototype, knowledge, use, sale, offer for sale, any documents or other items evidencing any of the foregoing, and/or any other act or event defined in 35 U.S.C. § 102, taken singly or in combination, and having or occurring at a date such as to be potentially relevant under any subsection of 35 U.S.C. §§ 102 or 103.

25. "Product" means any machine, manufacture, apparatus, device, system, process, service, method, or instrumentality which is designed to function together electrically, mechanically, chemically, or otherwise, to achieve a particular function or purpose, including those offered for sale, sold, imported, or under development.

26. "Reflect," "reflecting," "concern," "concerning," "related," "relating," "relate," "refer," or "referring" and other variations thereof, as used herein shall be construed in their broadest possible sense, and mean without limitation and whether in whole or in part: referring to, constituting, bearing upon, commenting upon, reflecting, evidencing, pertaining to, describing, depicting, consisting of, containing, comprising, embodying, identifying, stating, discussing, analyzing, studying, summarizing, dealing with, relating to, or having any logical or factual connection whatsoever with the subject addressed, regardless whether the factual connection is favorable to or adverse to you.

27. "State," "describe," and "describe in detail" mean to state and describe, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event, date, and/or legal contention pertaining to the matter(s) inquired into in the Request.

28. "Thing" shall mean any tangible item, including without limitation, models, prototypes and samples of any device or apparatus or product.

29. "Third Party" means and includes any person or persons other than GoSecure and Defendants.

30. "Threat Monitoring Functionality" refers to the functionality in the Accused Products for monitoring activity on a computer system, identifying associations between activity sources and activity targets, storing the identified information in a data structure, and transmitting such information to at least one other computer system, including as described in GoSecure's Complaint. *See* D.I. 1 ¶¶ 62-76, 90-105.

## INSTRUCTIONS

1. The following shall apply to all Requests:

   a. The singular of any word includes its plural, and vice versa, to bring within the scope of these Requests any information that might otherwise be deemed outside their scope;

   b. The terms "and" and "or" shall be construed either conjunctively or disjunctively, to bring within the scope of these Requests any information that might otherwise be deemed outside their scope;

   c. The terms "all," "any," and "each" shall be construed as encompassing any and all to bring within the scope of these Requests any information that might otherwise be deemed outside their scope;

   d. "Including" shall not be used to limit any general category or description that precedes it and shall mean "including without limitation" so as to be inclusive; and

   e. The present tense shall be construed to include the past tense and vice versa.

2. In responding to these Requests, You are required to furnish all information that is available to You or subject to Your reasonable inquiry, including information in the possession of Your present and former attorneys, accountants, advisors, representatives, agents, employees, or other persons directly or indirectly employed by or connected with You, and anyone else otherwise

subject to Your control. All documents and things that respond, in whole or in part, to any portion of the Requests below shall be produced in their entirety, including all attachments and enclosures.

3. If there are no documents or things responsive to a particular request, You should so state in writing.

4. If You believe that any of the following Requests calls for an assertion of a claim of privilege or work product immunity, answer so much of the Request as is not objected to, state that part of each Request to which You raise an objection, and set forth the basis for Your claim of privilege or immunity with respect to such information You refuse to give—including providing a log having sufficient particularity that will enable GoSecure to assess Your claim of privilege or immunity in accordance with Federal Rule of Civil Procedure 26(b)(5).

5. In the event You contend that any of these Requests is objectionable, in whole or in part, state with particularity each such objection and the bases therefore, and respond to the remainder of the Request to the extent that You are not objecting to it.

6. If any Request is ambiguous or unclear to You, please contact undersigned counsel as soon as possible so that the Request can be clarified to avoid unnecessary delays in discovery.

7. Each request shall be deemed continuing, in accordance with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure, so as to require supplemental or mandatory responses should You obtain additional or different responsive information subsequent to Your initial responses.

8. If You do not agree with any definition of the terms provided herein, You are instructed to provide a reasonable, alternative definition for that term, consistent with industry custom and usage.

9. Each of the definitions and instructions contained herein shall be fully applicable to each Request notwithstanding that a definition or instruction above may, in whole or in part, be

reiterated in a particular Request and notwithstanding that a particular Request may incorporate supplemental instructions or definitions. If, however, You provided any alternate definitions in accordance with these instructions, indicate whether and how any answer to any Request would differ if You relied on Your alternate definition in responding to that Request instead of the definitions provided.

10. Each Request shall be construed independently, and no Request shall be viewed as limiting the scope of any other Request.

11. Each and every copy of a document or Thing that is different from the original because of stamps, indications of the recipient(s), handwritten notes, marks, attachments, or any other reason, is a separate document or Thing that must be produced.

12. In further accordance with Rule 34 of the Federal Rules of Civil Procedure, all documents and things produced for inspection and copying shall be organized and labeled to correspond with the categories in the Request or shall be produced as they are kept in the normal course of business.

13. If You produce any tape, disk, card, wire, or other electronic or mechanical recording or transcript, or any computer program in response to any Request, You shall also produce such documents, software, and instructions as necessary for the decoding, playing back, printing, and/or interpretation thereof, and any other documents that are necessary to convert said information into a useable format.

14. If production of any requested document(s) is objected to on the grounds that production is unduly burdensome, describe the burden or expense of the proposed discovery.

## REQUESTS FOR PRODUCTION

**REQUEST FOR PRODUCTION NO. 1:**

All Documents, Communications, or Things relating to GoSecure, including meetings between You and GoSecure, and documents and communications exchanged between You and GoSecure.

**REQUEST FOR PRODUCTION NO. 2:**

All Documents, Communications, or Things relating to meetings between GoSecure and at least one of Dmitri Alperovitch, George Kurtz, or Jeremy Gould.

**REQUEST FOR PRODUCTION NO. 3:**

All Documents, Communications, or Things exchanged between GoSecure and at least one of Dmitri Alperovitch, George Kurtz, or Jeremy Gould.

**REQUEST FOR PRODUCTION NO. 4:**

All Documents, Communications, or Things relating to the timing and circumstances of when Dmitri Alperovitch, George Kurtz, or Jeremy Gould first became aware of GoSecure.

**REQUEST FOR PRODUCTION NO. 5:**

All Documents, Communications, or Things relating to the timing and circumstances of when Dmitri Alperovitch, George Kurtz, or Jeremy Gould first became aware of the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 6:**

All Documents, Communications, or Things relating to the timing and circumstances of when You first became aware of the Asserted Patents, the ’872 Patent Application, the ’872 Patent Publication, the ’697 Patent Application, or the ’697 Patent Publication.

**REQUEST FOR PRODUCTION NO. 7:**

All Documents, Communications, or Things relating to the Asserted Patents, including the claim construction, validity, infringement, and enforceability of the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 8:**

All Documents, Communications, or Things relating to any evaluation by You of GoSecure's products or the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 9:**

All Documents, Communications, or Things referring to GoSecure or the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 10:**

All Documents, Communications, or Things referring to the Named Inventors.

**REQUEST FOR PRODUCTION NO. 11:**

All Documents, Communications, or Things relating to any secondary consideration or other objective evidence of non-obviousness of the Asserted Patents, including but not limited to any long-felt need, failure of others, commercial success, copying of the claimed invention by others, unexpected or superior results from the claimed invention, licensing or praise by others, criticism by others, or any other objective indicia of non-obviousness.

**REQUEST FOR PRODUCTION NO. 12:**

All Documents, Communications, or Things relating to any alleged prior art to, or searches for prior art, regarding the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 13:**

All Documents, Communications, or Things relating to any alleged non-infringing alternatives to the inventions of the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 14:**

All Documents, Communications, or Things relating to any design around or steps taken by You to mitigate or avoid infringement of the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 15:**

The manuals, instructions, communications, troubleshooting guides, service bulletins, technical bulletins, production specification sheets, operator manuals, and operation manuals, provided by You to customers from 2018 to date relating to the Accused Products.

**REQUEST FOR PRODUCTION NO. 16:**

Documents, Communications, and Things sufficient to show the architecture, design and operation of the Accused Products.

**REQUEST FOR PRODUCTION NO. 17:**

Documents, Communications, and Things sufficient to show the Threat Monitoring Functionality of each of the Accused Products.

**REQUEST FOR PRODUCTION NO. 18:**

Documents, Communications, and Things sufficient to show how a customer uses the Accused Products.

**REQUEST FOR PRODUCTION NO. 19:**

Documents, Communications, and Things sufficient to show how You test the Accused Products, including who performs the testing, where the testing is performed, and the extent to which all of the features of the Accused Products are tested.

**REQUEST FOR PRODUCTION NO. 20:**

Representative examples of the contracts between CrowdStrike and its customers for the Accused Products, including subscriber agreements, terms of use, terms of service and product or service requirements.

**REQUEST FOR PRODUCTION NO. 21:**

The source code for each of the Accused Products, including all versions released by CrowdStrike from 2018 to date.

**REQUEST FOR PRODUCTION NO. 22:**

Documents, Communications, and Things sufficient to show the in-licensing or out-licensing of patents, proprietary technology, software or know-how related or comparable to the Accused Products or the Asserted Patents.

**REQUEST FOR PRODUCTION NO. 23:**

Documents, Communications, and Things sufficient to show the date when CrowdStrike first made available to the public, sold or offered to sell each of the Accused Products.

**REQUEST FOR PRODUCTION NO. 24:**

Documents, Communications, and Things sufficient to show the gross sales, net sales, revenue, gross profits, and net profits generated by each of the Accused Products from 2018 to the present.

**REQUEST FOR PRODUCTION NO. 25:**

Documents, Communications, and Things generated in the past six years sufficient to show the sales and revenue forecasts for each of the Accused Products.

**REQUEST FOR PRODUCTION NO. 26:**

Documents, Communications, and Things sufficient to show the gross and net costs associated with the Accused Products from 2018 to the present, including production costs, marketing costs, distribution costs, research and development costs, advertising costs and costs to update.

**REQUEST FOR PRODUCTION NO. 27:**

Any agreements between You and any Third Party related to the development, testing, manufacture, distribution, sale, updating, or importation of each of the Accused Products.

**REQUEST FOR PRODUCTION NO. 28:**

Documents, Communications, and Things sufficient to show the marketing, advertising, and promotion of the Accused Products.

**REQUEST FOR PRODUCTION NO. 29:**

All market reports, industry reports, competitive analyses, surveys, or studies in the past six years, related to the Accused Products, any of Your competitors, or any competing products of the Accused Products, including but not limited to any analyses relating to customer purchasing habits, desires, needs, or preferences.

**REQUEST FOR PRODUCTION NO. 30:**

All market studies, competitive analysis, risk assessments, relating to the development and marketing of the Accused Products.

**REQUEST FOR PRODUCTION NO. 31:**

Documents, Communications, and Things sufficient to show features of the Accused Products that Your customers have identified as key features and capabilities, important features and capabilities, or features and capabilities driving demand for these products.

**REQUEST FOR PRODUCTION NO. 32:**

All documents showing the specifications for operation of the Accused Products relating to the key or important features that Your customers identified for the Accused Products.

**REQUEST FOR PRODUCTION NO. 33:**

Documents, Communications, and Things sufficient to show the number of downloads, users of, and uses of each of the Accused Products from 2018 to date.

**REQUEST FOR PRODUCTION NO. 34:**

Documents, Communications, and Things sufficient to show Your tracking of customers' use of the Accused Products.

**REQUEST FOR PRODUCTION NO. 35:**

Documents, Communications, and Things sufficient to show Your business plans within the past six (6) years relating to the Accused Products.

**REQUEST FOR PRODUCTION NO. 36:**

Documents, Communications, and Things sufficient to show where the Accused Products are developed, sold from, and hosted (i.e., within or outside the territory of the United States).

**REQUEST FOR PRODUCTION NO. 37:**

Documents, Communications, and Things sufficient to show how You determine pricing for each of the Accused Products, including what factors are considered to determine the pricing.

**REQUEST FOR PRODUCTION NO. 38:**

All patents and patent applications You have received or applied for relating to the Accused Products.

**REQUEST FOR PRODUCTION NO. 39:**

Documents, Communications, and Things that You intend to rely on regarding damages in the case, including the applicable reasonable royalty in this action, any documents relating to the royalty rate, royalty base, and the smallest salable patent-practicing unit for each of the Accused Products.

**REQUEST FOR PRODUCTION NO. 40:**

All Documents, Communications, and Things that You intend to rely on regarding the date of the hypothetical negotiation, including documents related to the release date of the Accused Products and the date that specific features of the Accused Products were incorporated or added.

**REQUEST FOR PRODUCTION NO. 41:**

Documents, Communications, and Things sufficient to show Your organizational structure, including with respect to employees and officers responsible for research, development, engineering, testing, marketing, distribution, sale, licensing, and updating the Accused Products.

**REQUEST FOR PRODUCTION NO. 42:**

All Documents, Communications, and Things identifying or containing information responsive to any interrogatory served in this action.

**REQUEST FOR PRODUCTION NO. 43:**

Documents sufficient to identify all individuals who assisted in the drafting and/or prosecution of the applications that led to the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 44:**

The complete prosecution file for each of the applications that led to any of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality and any parents, divisionals, continuations, continuations-in-part, or foreign counterparts thereof.

**REQUEST FOR PRODUCTION NO. 45:**

All Documents relating to the conception of any alleged invention of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality, including Documents that corroborate the conception date of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 46:**

All Documents relating to the reduction to practice of any alleged inventions of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality, including

Documents that corroborate the reduction to practice date of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 47:**

The curriculum vitae and/or résumé for each inventor of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 48:**

All sworn testimony, statements, declarations, or affidavits (oral or written) previously provided by any inventor of the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 49:**

All textbooks, articles, journals, speeches, presentations, or other publications of any kind referring or relating to the alleged inventions claimed in the patent(s) You contend marks, covers, or relates to the Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 50:**

All Documents and Communications relating to Your attempt(s) to hire any current or former employee of GoSecure, regardless of whether such attempt(s) were successful, including but not limited to complete human resources files for the employee(s), job description(s), employee contract(s), resume(s), and compensation information.

**REQUEST FOR PRODUCTION NO. 51:**

All Documents, Communications, and Things related to any of Your Board of Directors meetings relating to Threat Monitoring Functionality, including but not limited to meeting minutes, presentations, and other documents relating to Threat Monitoring Functionality.

**REQUEST FOR PRODUCTION NO. 52:**

Documents, Communications, and Things sufficient to show Your policies or practices regarding identifying and/or analyzing patents or patent applications relating to Threat Detection Functionality.

**REQUEST FOR PRODUCTION NO. 53:**

All Documents, Communications, and Things related to Threat Monitoring Functionality exchanged between You and Your investors, including any presentations regarding Your business strategy relating to Threat Monitoring Functionality provided to or received from Warburg Pincus, LLC.

**REQUEST FOR PRODUCTION NO. 54:**

All Documents, Communications, and Things, including e-mails, that You have exchanged with or communicated to any Third Party regarding this case, including any Third Parties that You have served with a subpoena.

**REQUEST FOR PRODUCTION NO. 55:**

Documents, Communications, and Things sufficient to show Your policies or practices regarding the retention or destruction of hard copy and electronic documents and hard copy and electronic versions of source code.

**REQUEST FOR PRODUCTION NO. 56:**

All non-privileged documents, communications, or things relating to this litigation.

**REQUEST FOR PRODUCTION NO. 57:**

All Documents, Communications, and Things on which You intend to rely in support of or opposition to any claim or defense in this litigation.

**REQUEST FOR PRODUCTION NO. 58:**

All Documents and Things that You intend to offer into evidence, use for demonstrative purposes, or use for impeachment at any trial or hearing in this case.

**REQUEST FOR PRODUCTION NO. 59:**

All Documents, Communications, and Things related to any joint defense group, or any other business or litigation group, effort, or endeavor, against GoSecure.

Dated: August 16, 2024

By: *<u>/s/ Giri Pathmanaban</u>*

S. Giri Pathmanaban (SBN: 24074865)
Daniel S. Todd (admitted *pro hac vice*)
LATHAM AND WATKINS LLP
300 Colorado Street, Suite 2400
Austin, TX 78701
Tel: (737) 910-7300
Giri.Pathmanaban@lw.com
Daniel.Todd@lw.com

Maximilian A. Grant (SBN: 481610)
LATHAM AND WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637-2200
Max.Grant@lw.com

Clement Naples (admitted *pro hac vice*)
LATHAM AND WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Tel: (212) 906-1200
Clement.Naples@lw.com

Amit Makker (admitted *pro hac vice*)
LATHAM AND WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Tel: (415) 391-0600
Amit.Makker@lw.com

**ATTORNEYS FOR PLAINTIFF GOSECURE, INC.**

## CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2024, a true and correct copy of the foregoing document was served on counsel of record in the manner indicated:

James L. Day
Erik C. Olson
Winston Liaw
FARELLA BRAUN + MARTEL LLP
One Bush Street, Suite 900
San Francisco, California 94104
Telephone: (415) 954-4400
Fax: (415) 954-4480
jday@fbm.com
eolson@fbm.com
wliaw@fbm.com

*VIA ELECTRONIC MAIL*

Deron R. Dacus
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, Texas 75701
Telephone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

*VIA ELECTRONIC MAIL*

*Attorneys for CROWDSTRIKE, INC., and CROWDSTRIKE HOLDINGS, INC.*

/s/ *Giri Pathmanaban*
Giri Pathmanaban