Molex, LLC
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February 17, 2025

VIA EMAIL ONLY
Ryan Griffin
Nelson Bumgardner Conroy PC
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Re: *Subpoenas in Sinotechnix LLC vs. Samsung Electronics Co., Ltd., et al., Civil Action No.2:24-CV-00544*

Dear Mr. Griffin,

This letter is in response to the subpoenas served on Molex, LLC ("Molex") on or about February 5, 2025, one for documents and one for testimony. Molex objects to both subpoenas on multiple grounds.

As an initial matter, the subpoenas require disclosure of privileged, proprietary, and/or confidential information that does not relate to the issues raised in the lawsuit. Molex has a legitimate interest in protecting its proprietary and confidential information from disclosure to third parties, especially to potential litigants and thus objects to the requested disclosure.

Second, the request for Molex to produce documents and provide testimony is improper because Molex neither provides nor designs LED lens and the activity referenced by Sinotechnix in the Subpoena was not done by Molex. The activity related any design, manufacture and sale of LED lenses was done by a South Korean entity Molex Korea Ltd. that is neither a subsidiary nor a parent of Molex. As Molex has neither possession, custody, nor control of the vast majority of the requested information, Sinotechnix should direct its requests to the proper party.

Third, the subpoena for documents includes multiple requests for documents that are far too broad in scope and not reasonably related to the dispute in question. For example, any request for documents from 2016 to the present is too broad as under US law, Sinotechnix is permitted to seek damages for six years prior to the date of filing of a complaint and activity prior to that six-year period is irrelevant to Sinotechnix claim for recovery. *See* 35 U.S.C. § 286. Similarly, the

request for information regarding sales to Samsung is seeking information that is irrelevant to the case as the manufacture and sales and delivery of the LED lenses provided by Molex Korea Ltd. took place outside of the US and thus such sales are completely irrelevant to all of Sinotechnix claims related to U.S. patent infringement.

Fourth, Molex objects to the request for testimony. The information sought in the request for testimony is duplicative of the information requested in the subpoena for documents. In addition, Molex notes that to the extent there are any individuals that might have knowledge of the deposition topics, such individuals reside in South Korea and work for Molex Korea Ltd. It is unreasonable to attempt to depose such individuals at an office in Illinois (this is especially true for a third party) as any deposition of these individuals would need to take place in South Korea and be done via a translator.

Fifth, Molex objects to the burden caused by the breadth of requests, especially for a non-party, as the subpoenas have asked for a large amount information approximately 30 days after serving the subpoenas. Such requests exceed the bounds of reasonableness that non-parties should be treated with pursuant to Rule 45.

Molex reserves all rights with respect to this matter and does not waive any other objection not expressly raised herein. To address the objections raised, Molex proposes that we meet and confer to see if it is possible to agree on more reasonably tailored requests for production.

With regards,
Molex, LLC

/S/ Stephen Sheldon