IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

VASU HOLDINGS, LLC, a Texas Corporation,	)	
Plaintiff,	)	Case No. 2:24-cv-00034-JRG-RSP
v.	)	
SAMSUNG ELECTRONICS CO., LTD., a Korean Corporation, and SAMSUNG ELECTRONICS AMERICA, INC., a New York Corporation,	)	
Defendants.	)	

PLAINTIFF VASU HOLDINGS, LLC'S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S INTERROGATORIES (NOS. 1-5, 8, 9, 13-15, 19-22, 25)

Pursuant to Fed. R. Civ. P. Rules 26 and 33, Plaintiff Vasu Holdings, LLC ("Plaintiff" or "Vasu") further responds to Defendant Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively with SEC, "Defendants" or "Samsung") Interrogatories 1-5, 8, 9, 13-15, 19-22, 25). Vasu makes these objections and responses herein (collectively "Responses") based solely on its current knowledge, understanding, and belief as to the facts and information reasonably available to it as of the date of the Responses.

Additional discovery and investigation may lead to additions to, changes in, or modifications of these Reponses. The Responses, therefore, are given without prejudice to Vasu's right to supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to provide subsequent discovered information and to introduce such subsequently discovered information at the time of any trial or proceeding in this action.

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GENERAL OBJECTIONS

1. Vasu hereby incorporates by reference each and every general objection set forth below into each and every specific Response. From time to time, a specific Response may repeat a general objection for emphasis or for some other reason. The omission of a general objection in a specific Response shall not be interpreted as a waiver of that general objection to that Response.

2. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are vague, ambiguous, unintelligible, or compound.

3. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are overly broad, unduly burdensome, seek information not relevant to the claim or defense of any party, and are not proportional to the needs of this case.

4. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are not reasonably calculated to lead to the discovery of admissible information.

5. Vasu objects to each and every Interrogatory, Definition and Instruction to the extent they are not reasonably calculated to lead to the discovery of admissible evidence because they are not properly limited in time.

6. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are unduly burdensome and oppressive, to the extent they subject Vasu to unreasonable and undue effort or expense.

7. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they seek information beyond Vasu's actual knowledge, possession, custody, or control.

8. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they are unreasonably cumulative or duplicative.

9. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

10. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they seek information within Defendants' possession, custody or control.

11. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they seek information in the public domain, information equally available to Defendant from another source and/or information that can be obtained more efficiently by Defendants through other means of discovery. Defendants can ascertain such information from its own records or from other sources at least as readily as Vasu.

12. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they seek confidential, business, financial, proprietary or sensitive information, or trade secrets of third parties, which may be subject to pre-existing protective order(s) and/or confidentiality agreements or in which any third party has an expectation of privacy. Such information shall not be provided absent an express order to the contrary from a court of competent jurisdiction, or an authorization from the third party having the interest in the information's confidentiality.

13. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they seek information protected by the attorney-client privilege, the work product doctrine, common interest doctrine or any other applicable law, privilege, doctrine or immunity. Vasu will not disclose any information so protected, and the inadvertent disclosure or

identification of any such information is not intended as, and will not constitute, a waiver of such privilege, doctrine, or immunity.

14. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they call for a legal conclusion. Vasu's responses shall not be construed as providing legal conclusions concerning the meaning or application of any terms used in Defendant's Interrogatories.

15. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are premature, as they seek documents that are set to be disclosed on scheduled dates directed by the Court or the District of Texas Patent Local Rules.

16. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are premature as the Court has not yet entered a claim construction order in this action.

17. Vasu objects to each and every Interrogatory, Definition, and Instruction as premature to the extent they seek information that will be the subject of expert testimony.

18. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they impose obligations inconsistent with the Scheduling Order, Protective Order, ESI Order to be entered in this case or any applicable standing orders.

19. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent they assume or mischaracterize any facts. Vasu's responses shall not be construed as agreeing to any facts or characterizations contained in Defendants' Interrogatories.

20. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they purport to impose any requirement or discovery obligation greater than or

different from those imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court, or orders of the Court governing these proceedings.

21. Vasu objects to each and every Interrogatory, Definition, and Instruction to the extent that they are unduly burdensome and oppressive on the grounds that they purport to require Vasu to search its facilities and inquire of its employees other than those facilities and employees that would reasonably be expected to have responsive information. Vasu's Responses and productions are based upon: (1) a search of facilities and files that could reasonably be expected to contain responsive information and (2) inquiries of Vasu's employees and/or representatives who could reasonably be expected to possess responsive information.

22. Vasu objects to each and every Definition, Instruction, and Interrogatory to the extent it is compound and/or contains multiple subparts. Vasu will count each subpart as a separate interrogatory pursuant to Federal Rule of Civil Procedure 33(a). Vasu will not respond to interrogatories in excess of the allotted number of interrogatories established in the Court's scheduling order.

23. Vasu's written responses and production of documents are not intended to waive, and do not constitute waiver of, any objection that Vasu may have to the admissibility, authenticity, competency, relevance, or materiality of any documents produced or referred to in response to an Interrogatory. For any and all written responses and production of documents, Vasu reserves all objections or other questions regarding the admissibility, authenticity, competency, relevance, or materiality of any documents produced or referred to in response to an Interrogatory, as evidence in this Litigation or any other proceeding, action, or trial.

24. Vasu's written responses and production of documents are based upon information and writings available to and located by its attorneys as of service of these

Responses. Vasu has not completed its investigation of the facts relating to this case, has not completed discovery in this action, and has not completed preparation for trial. All the information supplied and documents and things produced are based only on such information and documents that are reasonably available and specifically known to Vasu and its attorneys as of the date of service of these Responses. Therefore, Vasu's written responses and production of documents are without prejudice to its right to supplement and/or amend its written responses and production of documents and to present at trial or other proceeding evidence discovered hereafter.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

In addition to the objections set forth below, Vasu hereby specifically incorporates each and every general objection set forth above in its objections to Defendants' definitions and instructions.

1. Vasu objects to Defendants' Definitions of the terms "Plaintiff," "You," "Your," and "Vasu" and objects to each Interrogatory that incorporates any of these terms, to the extent they are overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Vasu further objects to these definitions, and to each Interrogatory that incorporates any of these terms, to the extent that they call for a legal conclusion or seek documents or information protected from discovery by the attorney-client privilege, the work product doctrine, the common interest doctrine or any other applicable law, privilege, doctrine or immunity. Vasu further objects to these definitions, and to each Interrogatory that incorporates any of these terms, to the extent they include entities and persons over whom Vasu has no control.

2. Vasu objects to Defendants' Definition of the term "Defendants" and "Samsung" and to each Interrogatory that incorporates these terms, to the extent they are too narrow and fail to include each of Samsung's past and present officers, directors, employees, counsel, agents, consultants, representatives, and any other persons acting on behalf of any of the foregoing, and Defendants' affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors, and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by Samsung, and all predecessors and successors in interest to such entities.

3. Vasu objects to Defendants' Definition of the term "Asserted Patents" or "Patents-in-Suit" and to each Interrogatory that incorporates these terms, to the extent that they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they seek information not at issue in this case.

4. Vasu objects to Defendants' Definition of the term "Asserted Claim(s)" and to each Interrogatory that incorporates these terms, to the extent that they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they seek information not at issue in this case.

5. Vasu objects to Defendants' Definition of "Related Patents" and to each Interrogatory that incorporates these terms, to the extent that they are ambiguous, overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they seek information that is not relevant and/or not proportional to the needs of the case. Vasu objects to these Definitions to the extent they seek information that exceeds the

scope of the relevance to the Asserted Patents. Vasu further objects to these Definitions to the extent they call for legal conclusions.

6. Vasu objects to Defendants' Definition of "Related Litigation" and to each Interrogatory that incorporates these terms, to the extent that they are ambiguous, overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they seek information that is not relevant and/or not proportional to the needs of the case. Vasu objects to these Definitions to the extent they seek information that exceeds the scope of the relevance to the Asserted Patents. Vasu further objects to these Definitions to the extent they call for legal conclusions.

7. Vasu objects to Defendants' Definition of the term "Accused Product(s)" and to each Interrogatory that incorporates these terms, to the extent that they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they seek information not at issue in this case.

8. Vasu objects to Defendants' Definition of the terms "Infringe," and "Infringement" and to any Interrogatory that incorporates these terms, to the extent that they call for a legal conclusion.

9. Vasu objects to Defendants' Definition of the term "Person" and to each Interrogatory that incorporates this term as overbroad and seeking to impose obligations greater or different than those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or protective order entered in or applicable to this action. Vasu further objects to this Definition, and to each Interrogatory that incorporates any of these terms, because it is not proportional to the needs of the case, such that the burden or expense of the proposed discovery

outweighs its likely benefit. Vasu further objects to this Definition, and to each Request that incorporates this term, to the extent it is vague, overbroad, and unduly burdensome.

10. Vasu objects to Defendants' Definition of the term "Document" and "Thing" and to each Interrogatory that incorporates this term, to the extent they seek to impose obligations greater or different than those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or ESI order or protective order entered in this action. Vasu further objects to this Definitions, and to each Interrogatory that incorporates this terms, to the extent that they call for the production of information that the parties have agreed not to preserve or produce. Vasu further objects to these definitions, and to each Interrogatory that incorporates this term, to the extent they are vague, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

11. Vasu objects to Defendant's Definition of the term "Communication" and to each Interrogatory that incorporates this term, to the extent they seek to impose obligations greater or different than those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Evidence and/or ESI order or protective order entered in this action. Vasu further objects to this Definition, and to each Interrogatory that incorporates this terms, to the extent that they call for the production of information that the parties have agreed not to preserve or produce. Vasu further objects to these definitions, and to each Interrogatory that incorporates this term, to the extent they are vague, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

12. Vasu objects to Defendants' Definitions of the terms "Concern," "Concerning," "Evidence," "Evidencing," "Reflect," "Reflecting," "Relating to," "Relates to," "Referring to," "Refer to," "Refers to," "Referred to," and "Regarding," "Refer or relate to," "Referring or

relating to," and "Referred or related to" and to each Interrogatory that incorporates these terms, to the extent they are overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence, and to the extent they call for legal conclusions. Vasu further objects to these definitions, and to each Interrogatory that incorporates them, to the extent that they are vague, ambiguous and/or unintelligible.

13. Vasu objects to Defendants' Definition of "Prior Art," and to each Interrogatory that incorporates this term, to the extent it is vague, ambiguous, unintelligible and/or calls for a legal conclusion, and to the extent that it is broader than the meaning of "prior art" pursuant to 35 U.S.C. §101 et seq. and related case law. Vasu further objects to the Definition of the term "Prior Art," and to each Interrogatory that incorporates this term, to the extent it seeks information about patents that are not at issue in this case.

14. Vasu objects to Defendants' Definitions of the terms "any," "all," "every," and "each" and variations thereof, to each Interrogatory that incorporates any of these terms, to the extent they are overbroad, unduly burdensome and is not proportional to the needs of the case, such that the burden or expense of the proposed discovery outweighs its likely benefit. Vasu further objects to these Definitions, and to each Interrogatory that incorporates them, to the extent that they are vague, ambiguous, and/or unintelligible.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Separately for each Asserted Claim of the Asserted Patents, identify the priority date (a date certain) to which Plaintiff contends the Asserted Claim is entitled and the basis therefor, including, without limitation, identification of all portions of the specification of any earlier Related Patents and/or applications leading to such Related Patents that support such priority

date and description in detail on an element-by-element basis, all facts regarding the conception and reduction to practice, including but not limited to the date(s) and location(s) of conception and reduction to practice, all acts Plaintiff contends represent diligence occurring between the dates of conception and reduction to practice, each Person involved in such conception, diligence, and/or reduction to practice, the description of each Person's role and participation in such conception and reduction to practice and the dates of their involvement, a description of all then-existing, commercially available devices using the claimed functionality, each Person involved in such conception and reduction to practice analyzed, reviewed, or was otherwise aware of, and all Documents (by Bates number) that Plaintiff contends support its response.

RESPONSE TO INTERROGATORY NO. 1:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "for each Asserted Claim of the Asserted Patents," "all acts Vasu contends represent diligence occurring between the dates of conception and reduction to practice." Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this Interrogatory as premature to the extent it calls for subsequent discovery in this action and/or expert testimony that will be provided according to deadlines set forth by the Court. Vasu objects to this Interrogatory as being compound and

having multiple subparts, which should count toward the limits on Interrogatories. Vasu objects to this interrogatory because it is not required to affirmatively prove entitlement to a priority date as this Interrogatory requests. *Tech. Licensing Corp. v. Videotek, Inc.*, 545 F.3d 1316, 1328-29 (Fed. Cir. 2008) (confirming that because defendant bears the burden to show invalidity, patentee need not prove entitlement to priority date except to the extent it rebuts evidence of anticipation or lack of section 112 support). Defendants have not asserted alleged prior art that falls in between the priority date of the Asserted Patents and the actual filing dates of the Asserted Patent applications. Defendants have offered no evidence that places the priority date of the Asserted Patents at issue.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Priority Dates

U.S. Patent Nos. 8,886,181; 10,206,154; 10,368,281; and 10,419,996 (the "Asserted NS Patents") claim priority to Provisional Patent Application No. 60/534,466, filed January 6, 2004 (the "NS Provisional App."). The NS Provisional App. includes support for all of the claims of the Asserted Patents. For example, it discloses a mobile device that switches between both cellular and Wi-Fi networks. *See, e.g.*, NS Provisional App. at Abstract, Fig. 1, 1-4, Claims 1-11. The NS Provisional App. includes descriptions of the monitoring of signal strengths of wireless connection for the determination of switching networks. NS Provisional App. at Abstract, Fig. 1, 1-4. For example, the NS Provisional App. discloses timers triggered by predefined signal strength thresholds to initial switching. NS Provisional App. at Abstract, Fig. 1, 1, 3-4.

U.S. Patent Nos. 8,520,605 and 8,958,434 (the "Asserted ST Patents") claim priority to the Provisional Patent Application No. 60/352,258 filed February 11, 2005 (the "ST Provisional App."). The ST Provisional App. includes support for all of the claims of the Asserted Patents. For example, it discloses a controller device that receives simultaneous or concurrent content streams associated with content originators or specific content. ST Provisional App. at 1-2, 5-6, Fig. 1. The ST Provisional App. includes descriptions of the use of quality of service transmission characteristics in a content parameter module. *Id.* at 5-6, Fig. 1. For example, the ST Provisional App. further includes descriptions of selective processing of content data stream based on content parameter values. *Id.* at 1-2, Fig. 1.

Conception

Vasudevan Ganesan is the sole inventor of all but one of the Asserted Patents. Generally, his mission in developing the relevant technology in the Asserted Patents was to improve upon the operation of the nascent Wi-Fi technology. While mobile devices were originally not used for high-volume data, Mr. Ganesan foresaw that mobile consumers in the future would increasingly want to use Wi-Fi for high-volume content. Mr. Ganesan anticipated the rapid upward growth of Wi-Fi and said that Wi-Fi would ultimately replace cellular phones for connectivity and vehicles to transport content. In early 2003, Mr. Ganesan noticed some deficiencies in Wi-Fi. For example, the Wi-Fi signal profile was square, meaning the Wi-Fi signal strength increases and comes down at a 90-degree angle. This Wi-Fi strength profile means a user is inside or outside a Wi-Fi hotspot, and a Wi-Fi hotspot has a very short range. To address these, Mr. Ganesan started research and development on how to, without disruption, seamlessly hold in-progress content sessions when mobile consumers move between Wi-Fi and cellular networks. Mr. Ganesan conceived of the proactive predictive logic to predict the fall of

the Wi-Fi signal before the 90-degree fall down of signal strength to hold an in-progress content session without disruption seamlessly and without breakdown. Mr. Ganesan understood technology was needed to hold the in-progress content session and then seamlessly transfer the in-progress content session to available cellular or another Wi-Fi hotspot. The intention was to keep communication sessions in progress with Wi-Fi as much as possible because Wi-Fi was much cheaper than cellular. Mr. Ganesan was unaware of any competition for this type of seamless session continuity.

Similarly, Mr. Ganesan began researching and developing how to control streams by content. Mr. Ganesan understood there was a need to provide coercive/disruptive control for broadband content. Mr. Ganesan worked on dynamically controlling the QOS parameters in the router for any given content based on its origin. Mr. Ganesan was unaware of any competition for this type of coercive/disruptive control for broadband content.

To develop these ideas further, Mr. Ganesan started HAVA Corporation in October 2003 and soon after began working on the NS Provisional App. and ST Provisional App.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

The claims to priority are supported by the entirety of the disclosure of the identified applications and should be considered in view of these disclosures, as well as the knowledge of a person of ordinary skill in the art at the time of the application. The table below provides a specific date and reference to which Vasu claims priority to for each Asserted Claim and exemplary support for each claim limitation.

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
‘181	1	01/06/2004	1[pre]	Abstract, Fig. 1, 1:17-26, 2:1-25, 3:1-29, 4:1-26, 6:1-3	Abstract, Figs. 1-3, 2:17-3:11, 3:33-4:2, 5:8-7:9
			1[a]	Abstract, Fig. 1, 2:1-23, 3:1-9, 4:1-3, 4:25-28, 5:1-4, 5:9-20, 6:1-14	Abstract, Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:49-4:2, 5:33-56, 6:10-16, 6:62-67, 7:4-23
			1[b]	Abstract, Fig. 1, 1:17-24, 2:1-19, 3:1-11, 4:1-3, 5:5-6, 6:6-9	Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:58-4:2, 4:44-62, 5:33-6:2, 6:10-41, 6:49-9.
			1[c]	Abstract, Fig. 1, 1:17-26, 2:5-17, 3:1-20, 4:1-28, 5:1-18, 6:6-9	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:49-4:18, 4:44-62, 5:23-6:16, 6:49-7:3
			1[d]	Abstract, Fig. 1, 2:1-13, 3:1-6, 13-29, 4:5-19, 5:9-18, 6:9-15	Abstract, Figs. 1-3, 5:33-7:9
			1[e]	Abstract, Fig. 1, 1:17-24, 2:21, 3:11-29, 4:1-28, 5:1-4, 5:7-18, 6:9-14	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:24-29, 3:49-4:18, 4:44-62, 5:23-6:16, 6:49-7:23
‘154	1	01/06/2004	1[pre]	Abstract, Fig. 1, 1:17-26, 2:1-25, 3:1-29, 4:1-26, 6:1-3	Abstract, Figs. 1-3, 2:17-3:11, 3:33-4:2, 5:8-7:9
			1[a]	Abstract, Fig. 1, 2:1-23, 3:1-9, 4:1-3, 4:25-28, 5:1-4, 5:9-20, 6:1-14	Abstract, Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:49-4:2, 5:33-56, 6:10-16, 6:62-67, 7:4-23
			1[b]	Abstract, Fig. 1, 1:17-24, 2:1-19, 3:1-11, 4:1-3, 5:5-6, 6:6-9	Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:58-4:2, 4:44-62, 5:33-6:2, 6:10-41, 6:49-9.

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
			1[c]	Abstract, Fig. 1, 1:17-26, 2:5-17, 3:1-20, 4:1-28, 5:1-18, 6:6-9	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:49-4:18, 4:44-62, 5:23-6:16, 6:49-7:3
			1[d]	Abstract, Fig. 1, 2:1-13, 3:1-6, 13-29, 4:5-19, 5:9-18, 6:9-15	Abstract, Figs. 1-3, 5:33-7:9
			1[e]	Abstract, Fig. 1, 1:17-24, 2:21, 3:11-29, 4:1-28, 5:1-4, 5:7-18, 6:9-14	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:24-29, 3:49-4:18, 4:44-62, 5:23-6:16, 6:49-7:23
	43	01/06/2004	43[pre]	Abstract, Fig. 1, 1:17-26, 2:1-25, 3:1-29, 4:1-26, 6:1-3	Abstract, Figs. 1-3, 2:17-3:11, 3:33-4:2, 5:8-7:9
			43[a]	Abstract, Fig. 1, 2:1-23, 3:1-9, 4:1-3, 4:25-28, 5:1-4, 5:9-20, 6:1-14	Abstract, Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:49-4:2, 5:33-56, 6:10-16, 6:62-67, 7:4-23
			43[b]	Abstract, Fig. 1, 1:17-24, 2:1-19, 3:1-11, 4:1-3, 5:5-6, 6:6-9	Figs. 1-3, 2:35-48, 2:60-3:11, 3:33-45, 3:58-4:2, 4:44-62, 5:33-6:2, 6:10-41, 6:49-9.
			43[c]	Abstract, Fig. 1, 1:17-26, 2:5-17, 3:1-20, 4:1-28, 5:1-18, 6:6-9	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:49-4:18, 4:44-62, 5:23-6:16, 6:49-7:3
			43[d]	Abstract, Fig. 1, 2:1-13, 3:1-6, 13-29, 4:5-19, 5:9-18, 6:9-15	Abstract, Figs. 1-3, 5:33-7:9
			43[e]	Abstract, Fig. 1, 1:17-24, 2:21, 3:11-29, 4:1-28, 5:1-4, 5:7-18, 6:9-14	Abstract, Figs. 1-3, 2-17-48, 2:60-3:11, 3:24-29, 3:49-4:18, 4:44-62,

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
					5:23-6:16, 6:49-7:23
‘281	1	01/06/2004	1[pre]	--	--
			1[a]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-3:23, 3:33-4:2 4:19-53, 5:8-6:2, 6:20-45, 7:4-9
	12	01/06/2004	12[pre]	--	--
			12[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			12[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:35-41, 3:33-45, 5:8-19, 5:57-59, 6:24-29
			12[c]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			12[d]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-32, 2:35-48, 3:3-45, 4:19-32, 5:27-32, 5:67-6:2, 6:33-54,
			12[e]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
					62, 6:20-24, 6:35-37
			12[f]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-3:11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:33-54
			12[g]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			12[h]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 6:20-48
	23	01/06/2004	23[pre]	--	--
			23[a]	Abstract, Fig. 1, 1:17-22, 2:2-5, 2:11-13, 2:15-23, 2:28-3:9, 3:18-27, 4:1-8, 4:17-21	Abstract, Fig. 1, Fig. 2, Fig. 3, 1:60-64, 2:22-32, 2:35-48, 2:60-62, 3:5-29, 4:58-67, 4:19-32, 4:56-62, 5:19-27, 5:33-39, 6:10-12, 6:62-67
			23[b]	Abstract, Fig. 1, 1:17-22, 2:2-5, 2:11-13, 2:15-23, 2:28-3:9, 3:18-27, 4:1-8, 4:17-21	Abstract, Fig. 1, Fig. 2, Fig. 3, 1:60-64, 2:22-32, 2:35-48, 2:60-62, 3:5-29, 4:58-67, 4:19-32, 4:56-62, 5:19-27, 5:33-39, 6:10-12, 6:62-67
			23[c]	Abstract, Fig. 1, 1:17-26, 2:1-17,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:49-65, 3:1-21, 4:19-

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
				2:20-24, 2:28-29, 3:2-29, 4:1-23	62, 5:8-47, 5:51-56, 5:59-62, 6:20-38, 7:4-9
	31	01/06/2004	31[pre]	--	--
			31[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			31[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:35-41, 3:33-45, 5:8-19, 5:57-59, 6:24-29
			31[c]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			31[d]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-34, 3:58-4:2, 4:19-32, 5:33-66, 6:20-32, 7:4-9
			31[e]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-34, 3:58-4:2, 4:19-32, 5:33-66, 6:20-32, 7:4-9
			31[f]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-3:23, 3:33-4:2 4:19-53, 5:8-6:2, 6:20-45, 7:4-9
	37	01/06/2004	37[pre]	--	--

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
			37[a]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-3:23, 3:33-4:2 4:19-53, 5:8-6:2, 6:20-45, 7:4-9
	45	01/06/2004	45[pre]	--	--
			45[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			45[b]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			45[c]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-48, 2:60-3:11, 3:58-4:2, 4:19-32, 4:4, 4-62, 5:7-32, 5:57-6:2, 6:10-16, 6:49-54, 6:62-67, 7:4-9
'996	1	01/06/2004	1[pre]	--	--
			1[a]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-53, 5:8-6:2, 6:20-45, 7:4-9
	12	01/06/2004	12[pre]	--	--
			12[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
			12[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			12[c]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	23	01/06/2004	23[pre]	--	--
			23[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			23[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			23[c]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	25	01/06/2004	25[pre]	--	--
			25[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
			25[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 3:58-4:2, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			25[c]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	34	01/06/2004	34[pre]	--	--
			34[a]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	35	01/06/2004	35[pre]	--	--
			35[a]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	39	01/06/2004	39[pre]	--	--
			39[a]	Abstract, Fig. 1,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-34, 3:58-4:2, 4:19-32, 5:33-66, 6:20-32, 7:4-9
			39[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-34, 3:58-4:2, 4:19-32, 5:33-66, 6:20-32, 7:4-9
			39[c]	Abstract, Fig. 1, 2:17-26, 2:2-5, 2:11-24, 2:28-3:9, 4:1-3	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:60-65, 3:1-11, 4:19-32, 4:44-62, 5:8-32, 5:36-42, 5:51-56, 5:59-62, 6:20-24, 6:35-37
			39[d]	Abstract, Fig. 1, 1:17-26, 3:5-10, 3:2-22, 4:1-14	Abstract, Fig. 1, Fig. 2, Fig. 3, 5:57-

Patent	Claim	Priority Date	Claim Limitation	NS Provisional Application Support	U.S. Patent No. 7,991,399 Support
					6:2, 6:10-16, 6:49-67
			39[e]	Abstract, Fig. 1, 1:17-26, 2:1-17, 2:20-24, 2:28-29, 3:2-29, 4:1-23	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9
	41	01/06/2004	41[pre]	--	--
			41[a]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-34, 3:58-4:2, 4:19-32, 5:33-66, 6:20-32, 7:4-9
			41[b]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 5:57-6:2, 6:10-16, 6:49-67, 7:4-9
			41[c]	Abstract, Fig. 1, 1:21-26, 2:5-19, 3:2-18, 4:1-11,	Abstract, Fig. 1, Fig. 2, Fig. 3, 2:17-4:2 4:19-62, 5:8-6:2, 6:20-45, 7:4-9

Vasu clarifies that Vasu's predecessor entity constructively reduced to practice the Asserted Patents California, U.S.A.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 2:

For each Asserted Claim, state when, where, by whom, to whom, and under what terms the alleged invention, in whole or in part, was first publicly disclosed, demonstrated, used, sold, given away, or offered for sale by an inventor or any other Person. For clarity, this includes (on a claim-by-claim basis) an identification of all Documents and things evidencing and Persons knowledgeable about each such demonstration, use, disclosure, sale, gift, or offer for sale.

RESPONSE TO INTERROGATORY NO. 2:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "all Documents and things." Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this Interrogatory to the extent that it seeks information that is covered by confidential agreements with third-parties and/or protective orders of other litigations or any other proceedings.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu is unaware of any public disclosure, demonstration, use, sale, giveaway, or offer for sale for any products that embody the claimed invention before the priority date of the Asserted Patents.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

With the exception of the documents related to the prosecution and issuance of the Asserted Patent, Vasu is unaware of any non-privileged disclosure of the subject matter disclosed

or claimed in any Asserted Patent before the first publication of the Asserted Patents or family members in its chain or priority. Vasu is also unaware of any demonstration, use, sale, giveaway, or offer for sale for any products that embody the claimed invention before the first publication of the Asserted Patents or family members in its chain or priority.

INTERROGATORY NO. 3:

For each Patent-in-Suit, identify any and all products, systems or software or systems manufactured, sold, or used by any Person that has embodied, practiced, fallen within the scope of, or used any Asserted Claim; state the period of time during which such products, systems or software were sold; identify and describe including by patent number each instance of patent marking compliant with 35 U.S.C. § 287, including any efforts by Plaintiff or previous assignees to compel all licensees of any of the Patents-in-Suit to mark products, systems or software covered by the Patents-in-Suit and all instances of which Plaintiff is aware in which any licensee marked or did not mark its products, systems or software with the number(s) of any of the Patents-in-Suit, and state the period of time during which such products, systems or software, if any, were marked and with which patents; and identify the persons most knowledgeable thereof and all documents and things relating thereto.

RESPONSE TO INTERROGATORY NO. 3:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "any and all products, systems, or software of

systems manufactured, sold, or used by any Person that has embodied, practiced, fallen within the scope of, or used any Asserted Claim." Vasu will address, to the extent any exist, products, systems, or software of systems manufactured, sold, or used by Vasu and Defendant. Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this Interrogatory as being compound and having multiple subparts, which should count toward the limits on Interrogatories. Vasu objects to this Interrogatory to the extent it asks for information that is irrelevant, overbroad, and unreasonably burdensome, including information on whether any third-parties may infringe that Asserted Claims. Vasu limits its response to products, systems, or software that were developed by Vasu or Defendant.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu has not disclosed, sold, or commercialized any product, system, software, or system that embodies all elements of any Asserted Claim. Accordingly, Vasu is not aware of any marking by Vasu. Additionally, Vasu did not commercialize any product that embodied the asserted claims. Vasu did not license a product that embodies all of the limitations of any Asserted Claims. Regarding products embodying the asserted claims, Vasu identifies the products set forth in its infringement contentions and all supplements thereto and incorporates them by reference herein.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Any potential Vasu's knowledge of products, software, or systems from other parties that allegedly fall within the scope of the Asserted Claims is protected by attorney-client privilege and work product doctrine. *Astra Aktiebolag v. Andrx Pharms., Inc.*, 208 F.R.D. 92, 104-106(S.D.N.Y. 2002) (finding documents relating to a third-party's infringement of the same patent asserted in the case were protected by attorney-client privilege and the work product doctrine). Additionally, such discovery is not relevant to any party's claim or defense and invites a fishing expedition. *Crossland v. Nationwide Mut. Ins. Co.*, No. EP-18-CV-00085-DCG, 2018 WL 4905354, at *1 (W.D. Tex. Oct. 9, 2018) ("Rule 26(b), although broad, may not be used as a license to engage in an unwieldy, burdensome, and speculative fishing expedition.").

INTERROGATORY NO. 4:

Identify and describe each attempt to commercialize, market, license, assign, sell, and/or otherwise monetize the Patents-in-Suit or Related Patents including 1) identifying each actual settlement, license, sublicense, or sale (by Bates number); 2) the dates on which negotiations for such attempted monetization began and ended; 3) all Documents (by Bates number) exchanged during negotiations and otherwise relating to such agreements and negotiations; 4) all terms of the agreement or offer to enter into an Agreement, including but not limited to any consideration suggested, offered, or given; and 5) the Person(s) with knowledge of such factual bases and all documents (by Bates number) relating to any of the foregoing.

RESPONSE TO INTERROGATORY NO. 4:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest

doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "each attempt to commercialize, market, license, assign, sell and/or otherwise monetize the Patents-in-Suit or Related Patents." Vasu will address Vasu's attempts to commercialize, market, license, assign, sell, and/or otherwise monetize the Patents-in-Suit or Related Patents with respect to companies offering infringing products or services. Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this Interrogatory to the extent that it seeks information that is covered by confidential agreements with third-parties and/or protective orders of other litigations or any other proceedings.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu has not licensed the Patents-in-Suit or Related Patents. Vasu has not approached any potentially infringing companies in an effort to commercialize, market, license, sell, or otherwise monetize the Asserted Patents. Vasu has not commercialized or marketed any products that embody the Patents-in-Suit.

In 2014, a law firm, representing an anonymous client, approached Hava Corporation to purchase the Asserted Patents. However, Hava Corporation responded that it was not interested in selling its intellectual property. The Asserted Patents have been assigned as summarized in the table below. All of the assignments have been between related entities.

Asserted Patent	Assignments
8,520,605	• 10/27/2005: From Vasudevan Ganesan to Hava Corporation • 10/6/2010: From Hava Corporation to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC
8,958,434	• 10/27/2005: From Vasudevan Ganesan to Hava Corporation • 10/6/2010: From Hava Corporation to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC
8,886,181	• 1/11/2006: From Vasudevan Ganesan to Hava Corporation • 10/6/2010: From Hava Corporation to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC
10,206,154	• 1/11/2006: From Vasudevan Ganesan to Hava Corporation • 10/6/2010: From Hava Corporation to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC
10,368,281	• 1/6/2005: From Vasudevan Ganesan to Hava Corporation

Asserted Patent	Assignments
	• 10/6/2010: From Hava Corporation to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC
10,419,996	• 3/13/2018: From Vasudevan Ganesan and Stephane H. Maes to Vasu Networks Corporation • 7/11/2023: From Vasu Networks Corporation to Vasu Holdings, LLC

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

Attempt to Purchase Vasu as a Company

On October 13, 2014, Vasu received an unsolicited inquiry to purchase Vasu Networks. The inquiry was from Mr. David Ryan from Upton Financial Group, Inc. who indicated he was working with a highly qualified buyer who is very interested in Vasu Networks. Vasu responded, on October 14, 2014, noting Vasu was seeking capital raise, not selling our company. There were no further communications between Mr. Ryan and Vasu.

Attempts to Purchase the Vasu's Patents

On June 14, 2014, Vasu received an unsolicited inquiry to purchase three publications from the patent portfolio--one of which is asserted U.S. Patent No. 8,886,181. The email addressed to Vasu's patent prosecution attorney, Mr. Jonathan Owens, was sent by Mr. Britten D. Sessions from Zilka-Kotab, PC. Mr. Sessions was representing an unnamed buyer. The same

day, Mr. Owens replied stating he had spoken with his client, but they are not interested in selling these assets. Mr. Sessions requested he be informed if Vasu's position changes.

On August 17, 2015, Vasu received an unsolicited verbal proposal for the its IP from Mr. Sasha Sokhis of Blackstone IP who expressed that they found the patent portfolio to be valuable. Vasu had been working with Blackstone IP to secure a debt loan. Vasu rejected Blackstone's proposal thanking for the proposal, but it will not sell its patents.

On December 17, 2015, Vasu's patent prosecution firm, Haverstock & Owens LLP received an unsolicited inquiry to purchase the patents. Mr. F. Fitzgerald Maloney of ICAP IP noting his buyers have expressed interested in the technology covered by Vasu Networks Corp's patent portfolio. Mr. Maloney's inquiry was not responded to.

On December 27, 2023, Vasu received an unsolicited inquiry to purchase the patents from Alec Schibanoff of IPOfferings. Mr. Schibanoff noting he had a buyer looking to acquire Wi-Fi technology patents and inquired whether Vasu's patents were available for acquisition. Mr. Schibanoff's inquiry was not responded to.

Discussions Related to Monetization Vasu's Patents

On April 20, 2020, Mr. Ozer Teitelbaum from Ocean Tomo contacted Mr. Ganesan and offered his investment bank's services. A phone call was proposed but did not occur. There were no subsequent exchanges between Messrs. Teitelbaum and Ganesan.

On May 11, 2020, Mr. Ganesan reached out to John Ciannamea at Blackhawk Technologies. A phone call was proposed but did not occur. There were no subsequent exchanges between Messrs. Ciannamea and Ganesan.

On May 11, 2020, Mr. Ganesan reached out to John Koepke at Red Chalk. A phone call was proposed but did not occur. There were no subsequent exchanges between Messrs. Koepke and Ganesan.

On May 11, 2020, Mr. Ganesan reached out to Mr. Emmanuel Ejiogu at Tynax. Mr. David Smith requested the list of patents from Mr. Ganesan after Mr. Ejiogu forwarded the email to him. Mr. Smith followed up noting the portfolio might be a good match for a client he was sourcing patents for, but he needed the green light on a revenue sharing deal that might be acceptable to the patent holder. There were no subsequent exchanges between Messrs. Smith and Ganesan.

On May 12, 2020, Mr. Ganesan reached out to James Trueman at TrueNorth IP. Mr. Trueman requested a patent list and whether there were any suspected infringers. There were no subsequent exchanges between Messrs. Trueman and Ganesan.

On May 12, 2020, Mr. Ganesan reached out to Mr. Michael McLaughlin at IP Investment Group. Mr. Bill Hartselle requested a patent list and an estimated price for the patents. Mr. Ganesan provide the patent numbers but no estimated prices. Mr. Hartselle decided not to move forward. There were no subsequent exchanges between Messrs. Trueman and Ganesan.

On May 13, 2020, Mr. Ganesan reached out to Mr. Chris Sommers at Thinkfire. After an initial exchange, Mr. Sommers followed up with questions. There were no subsequent exchanges between Messrs. Sommers and Ganesan.

On May 13, 2020, Mr. Ganesan reached out to Mr. Philip Parker at PJ Parker and Co. Mr. Parker requested the patent numbers. There were no subsequent exchanges between Messrs. Parker and Ganesan.

On May 13, 2020, Mr. Ganesan reached out to Anders Arvidsson at Parallel North IP. On May 15, 2020, Mr. Messrs. Arvidsson and Ganesan had a phone call. After receiving an NDA from Mr. Ganesan, followed up with business-specific questions. There were no subsequent exchanges between Messrs. Arvidsson and Ganesan.

On May 13, 2024, Mr. Ganesan had an initial correspondence with Mr. Paolo Foà at N&G Consulting. Mr. Foà followed up with questions. There were no subsequent exchanges between Messrs. Foà and Ganesan.

On May 13, 2024, Mr. Ganesan had an initial correspondence with Mr. Ryan Hannekan from RPX Corp. Mr. Hannekan proposed a phone call with Mr. Ganesan. There were no subsequent exchanges between Messrs. Hannekan and Ganesan.

On May 14, 2020, Mr. Ganesan reached out to Min-Yong Song at PMME Partners. Mr. Sommers responded with an NDA request a commission-specific question. There were no subsequent exchanges between Messrs. Song and Ganesan.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 5:

Identify every person or entity with a current or prior financial, ownership, or other interest in the Patents-in-Suit or Related Patents, this Action, Related Litigations, or Past Litigations, and for each such person or entity, describe the nature of the interest held by that person or entity, and the relationship between such person or entity and its affiliates, on the one hand, and Plaintiff, on the other hand.

RESPONSE TO INTERROGATORY NO. 5:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case, including, for example, "Identify every person or entity with a current or prior financial, ownership, or other interest in the Patents-in-Suit or Related Patents, this Action, Related Litigation, or Past Litigation." Vasu objects to this Interrogatory in its use of the phrase "Related Patents," "Related Litigation," and "Past Litigation" because it seeks information that exceeds the scope of the relevance to the Patents-in-Suit and is thus overbroad, unduly burdensome, and not proportional to the needs of this case. Vasu objects to the term "interest" as overbroad and will address who controls the Patents-in-Suit. Vasu objects to this Interrogatory as seeking information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Vasu objects to this Interrogatory to the extent that it seeks information that is covered by confidential agreements with third-parties and/or protective orders of other litigations or any other proceedings.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu Holdings LLC (the successor entity to Vasu Networks Corporation) holds all ownership rights and interest in the Patents-in-Suit and has complete control over this Action.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:

Standing and real party in interest are not at issue in the instant case. A patentee has standing to bring a patent infringement action. *Lone Star Silicon Innovations LLC v. Nanya Tech. Corp.*, 925 F.3d 1225, 1229 (Fed. Cir. 2019) ("Title 35 allows a "patentee" to bring a civil action for patent infringement. The term patentee includes the original patentee (whether the inventor or original assignee) and "successors in title."). Here, Vasu is the successor in title of the Asserted Patents. Federal Circuit law requires that "all entities with an independent right to enforce the patent are indispensable or necessary parties to an infringement suit." *Ipventure v. Prostar*, 503 F.3d 1324, 1325 (Fed. Cir. 2007) ("Only the entity or entities that own or control all substantial rights in a patent can enforce rights controlled by that patent . . . Thus all entities with an independent right to enforce the patent are indispensable or necessary parties to an infringement suit."); *see also Sicom Sys. v. Agilent Techs., Inc.*, 427 F.3d 971, 980 (Fed. Cir. 2005) ("The patent holder or assignee is a necessary party to an infringement action in order to achieve consistency of interpretation and to avoid multiplicity of litigation. Under federal law, the patentee is the real party in interest in such litigation."). As previously noted, Vasu Holdings LLC holds all ownership rights and interest in the Patents-in-Suit, does not have any licenses for the Patents-in-Suit, and has complete control over his Action. Ownership of the Asserted Patents can be verified as it is publicly available. Thus, Vasu has standing and is the real party in interest.

INTERROGATORY NO. 8:

Explain in detail all facts and circumstances that support or otherwise relate to any secondary considerations of non-obviousness of any Asserted Claim, including identification of all Documents supporting Plaintiff's contention and including without limitation, Plaintiff's contention (if any) that the subject matter of any such claim: (a) satisfied a long-felt need, solved problems the industry failed to solve; (b) was the subject of skepticism expressed in the industry; (c) has been a commercial success; (d) has had its significance recognized by the industry; (e) has been copied by others; and/or (f) has achieved unexpected results; and further describe the alleged nexus between each such consideration and each Asserted Claim.

RESPONSE TO INTERROGATORY NO. 8:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it calls for information that is publicly available or equally available to Defendants, and therefore is of no greater burden for Defendants to obtain than for Vasu to obtain and produce. Vasu objects to this Interrogatory to the extent it seeks or requires information within Defendant's knowledge, possession, custody or control. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "all facts and circumstances," "identification of all Documents supporting Plaintiff's contention," and "including without limitation." Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case including, for example, in its use of the phrase "all facts and circumstances," "identification of all Documents supporting Plaintiff's contention," and "including without limitation." Vasu objects to this Interrogatory as being compound and having multiple subparts, which should

count toward the limits on Interrogatories. Vasu objects to this Interrogatory as premature to the extent it calls for subsequent discovery in this action and/or expert testimony that will be provided according to deadlines set forth by the Court. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

This Interrogatory is premature in seeking validity contentions when Samsung has yet to provide invalidity contentions and in seeking early disclosure of expert analysis.

The Asserted Claims were duly issued by the USPTO and are presumed to be valid under 35 U.S.C. § 282. Defendant bears the burden of establishing invalidity with clear and convincing evidence. Thus, it is Defendant's burden to come forward with a prima facie case of obviousness before secondary considerations become relevant. Vasu incorporates by reference its response to Interrogatory No. 14 regarding validity.

Copying and Commercial Success: Defendants Samsung copied the technology in the Asserted Patents and incorporated this technology into the Accused Products. Samsung achieved great commercial success based on the technology in the Asserted Patents (as will be shown in Samsung's financial records, which have not yet been produced). Samsung is the second-largest mobile telecommunications company in the United States. For evidence of Samsung's copying of Vasu's patented technology, Vasu refers to its responses to Interrogatory Nos. 6, 9, 13 and 17. As evidence of Samsung's use of Vasu's patented technology, Vasu incorporates by reference its infringement contentions and expert reports it will serve in accordance with the Docket Control Order.

Upon information and belief, other companies infringe Vasu's technologies. For example, Apple Inc.'s Wi-Fi Assist feature on their iPhone mobile devices appears to copy Vasu's technologies. Its Wi-Fi Assist feature allows users to stay connected to the Internet even if they have a poor Wi-Fi connection by automatically switching to cellular.

Long-Felt Need: The specification notes the long-felt need for Vasu's technology. As noted in the specification,

> Current telephone communications occur over wireless cellular networks, such as GSM, CDMA, and CDMA2000, Voice Over Internet (VOIP), or circuit switched network, such as PSTN. Current state of the art of most telephones used with such networks is that each telephone is restricted for use with only one specific network. For example, a cellular phone works in a cellular network; a VOIP phone works in VOIP network, and a landline phone works in a circuit switched network. Such limitations imply that an in-progress telephone communication cannot be seamlessly switched among cellular, VOIP, and circuit switched networks without losing the connection.
>
> Such wireless networks use regulated portions of the radio spectrum and are shared by many users. The infrastructure costs of wireless networks are relatively high due to the size and complexity of the network equipment. There is a wide variance in the performance of different wireless networks. For example, a conventional wireless cellular network covers a relatively large geographical area, but provides a relatively low bandwidth. Other wireless networks, such as CDMA2000-EV-DO/DV networks, offer higher bandwidth and enhanced data services, such as web browsing. However, these networks also pack many users into a relatively small portion of the regulated spectrum. Other types of wireless networks are adapted to improve spectral efficiency with increased speed and smaller coverage areas. For example, an IEEE 802.11x (or WiFi) network may transmit at speeds up to 11 Mbps using a Direct Sequence Spread Spectrum (DSSS) mode or at speeds up to 54 Mbps using an Orthogonal Frequency Division Multiplexing (OFDM) mode.
>
> A network wireless access point conforming to a WiFi (e.g., IEEE 802.11b) network may cover an area of a few hundred feet in diameter. Each such network access point is connected to a larger network (e.g., Internet). One such example is WiFi VOIP (Wireless Fidelity Voice over Internet Protocol), through which a communication device user can place a wireless telephone call over the Internet, using the technology specified in IEEE 802.xx at the network access point. VOIP is a method for taking analog audio signals and converting them into digital data that can be transmitted over the Internet. Conventional VOIP telephone communications are enabled by VOIP network carriers, which utilize VOIP networks (e.g. the Internet), to place VOIP based telephone calls. VOIP enabled

> and compatible networks include VOIP switching for proper routing and billing of VOIP based telephone calls.
>
> In order to cover larger geographical areas, a relatively large number of IEEE 802.11x, for example, network access points and relatively large wire-line back haul networks are required. In part, due to the relatively small geographical coverage area of each network access point, the resulting IEEE 802.11x based network may thus be prohibitively expensive to set up. Further, the small coverage areas may lead to many "dead zones" in which mobile communication device users are unable to place telephone calls using the VOIP network.
>
> Conventional VOIP phones, which function in a WiFi coverage area (hotspot) corresponding to a WiFi access point, offers relatively inexpensive telephone communications. However, the WiFi availability is limited due to the small geographical area supported by each WiFi access point.
>
> Conventional cellular phones, which function in a cell coverage area within the cellular network, are relatively expensive for telephone communications and have limited multimedia capabilities. Cellular networks and availability to the network covers a much wider, extensive geographical area.
>
> Conventional landline phones, which function in a circuit switched network such as most residences, do not offer extensive telephone communication features, for example video. Such landline phones also do not offer the mobility provided by mobile communications devices such as the VOIP phones or the cellular phones.

E.g., '181 Patent at 1:38-2:45.

Industry Recognition: Praise and recognition of the importance of Vasu's inventions as incorporated in the Accused Products. For example, in 2019, Samsung was awarded the "Best Wi-Fi Innovation Award" by the Wireless Broadband Alliance for its Intelligent Wi-Fi innovations, making it the first smartphone ever to receive the award. The award for this technology that embodies the Asserted Claims. In recognizing the award, Samsung noted:

> The innovation enables the device to recognize when a user has entered a space where Wi-Fi connections are likely to be unstable, and automatically switch to LTE connectivity to avoid network interruption. What's more, Intelligent Wi-Fi allows the device to more quickly detect weaker Wi-Fi signals in places like elevators, allowing it to transition from Wi-Fi to LTE connectivity much more quickly.

The praise and recognition are further reflected in Samsung's decision to cite Vasu's patents in 12 of its prosecutions as summarized in the table below.

Samsung Patent or Application	Vasu Patent or Application Cited
US 11,432,214	US 2015-0092747 (**US 10,206,154**)
US 11,082,815	US 2012-0033658 (**US 8,886,181**)[1]
US 11,159,594	**US 8,886,181**
US 9,319,943	US 2013-0250830
US 11,006,476	US 2015-0092747 (**US 10,206,154**)
US 10,791,492	US 2005-0147049
US 10,638,428	US 2015-0327147
US 9,723,530	US 2006-0121894
US 11,895,738	US 9,648,538 US 9,125,128 US 2011-0255416
US 9,483,223	US 2005-0147049
US 9,256,386	US 2005-0147049

[1] Bold text denotes an asserted patent.

US 2014-0244839	US 2005-0147049

The Vasu patent or applications cited by Samsung share specifications with the Asserted Patents or are of the Asserted Patents themselves. Beyond Samsung, other patent applicants and the United States Patent and Trademark Office examiners cited Vasu's Asserted Patents as prior art in at least 253 subsequent patent applications listed below, confirming the pioneering nature of the Asserted Claims:

253 Subsequent Applications Citing to the Asserted Patents

- ATE 527835T1
- CA 668025C
- CA 681984C
- CN 101247385B
- CN 101340722A
- CN 101584150A
- CN 102655669B
- CN 102984827A
- CN 102984827A
- CN 103796282A
- CN 103857068A
- CN 104284343B
- CN 105119937B
- CN 105187361B
- CN 105472744B
- CN 105519088A
- CN 105873146B
- CN 106229683A
- CN 106304117A
- CN 106792839A
- CN 107182093B
- CN 108417988B
- CN 108494444B
- CN 109273854B
- CN 110495218A
- CN 110831096B
- CN 110954159A
- CN 111050366A
- CN 111182652B
- CN 112042164A
- CN 114980236B
- DE 102015225388
- EP 1738538
- EP 1775891

- EP 1878440
- EP 1895383
- EP 2050286
- EP 2176997
- EP 2311292
- EP 2830366
- EP 3060026
- EP 3278598
- EP 3278599
- EP 3278627
- EP 3603209
- EP 3603211
- G538725A
- G560118A
- GB 495550A
- JP 2012090226A
- JP 4894532
- JP 5161400
- JP 5271999
- JP 5470590
- JP 6603402
- KR 100895688
- KR 101447920
- KR 101843052
- KR 102016644
- KR 102023402
- KR 102056408
- KR 102270034
- KR 102309839
- KR 102500347
- KR 102558475
- KR 2015/0114765A
- PL 2478678T3
- TWI 381754B
- US 7,099,309
- US 7,369,091
- US 7,392,050
- US 7,512,131
- US 7,660,565
- US 7,676,229
- US 7,688,754
- US 7,711,370
- US 7,729,489
- US 7,761,119
- US 7,830,844
- US 7,869,827
- US 7,873,384
- US 7,929,964
- US 7,979,097
- US 8,078,164

- US 8,090,095
- US 8,125,999
- US 8,195,815
- US 8,223,631
- US 8,249,590
- US 8,255,549
- US 8,270,965
- US 8,279,802
- US 8,279,850
- US 8,345,624
- US 8,362,917
- US 8,396,470
- US 8,437,809
- US 8,503,431
- US 8,514,867
- US 8,514,867
- US 8,520,605
- US 8,520,605
- US 8,538,393
- US 8,547,887
- US 8,577,354
- US 8,588,174
- US 8,627,399
- US 8,630,644
- US 8,676,926
- US 8,706,863
- US 8,744,523
- US 8,805,352
- US 8,825,108
- US 8,825,108
- US 8,838,152
- US 8,867,490
- US 8,892,104
- US 8,913,604
- US 8,913,604
- US 8,948,746
- US 8,958,784
- US 8,989,813
- US 8,995,254
- US 8,995,412
- US 9,009,343
- US 9,031,540
- US 9,042,266
- US 9,071,959
- US 9,100,790
- US 9,161,209
- US 9,161,312
- US 9,184,978
- US 9,189,124
- US 9,191,448

- US 9,198,027
- US 9,204,327
- US 9,232,531
- US 9,241,292
- US 9,270,799
- US 9,288,606
- US 9,344,987
- US 9,357,378
- US 9,363,165
- US 9,363,622
- US 9,378,343
- US 9,391,749
- US 9,392,395
- US 9,398,462
- US 9,398,505
- US 9,420,496
- US 9,426,641
- US 9,448,815
- US 9,467,854
- US 9,491,678
- US 9,510,256
- US 9,532,211
- US 9,549,009
- US 9,553,953
- US 9,554,415
- US 9,565,231
- US 9,565,712
- US 9,578,113
- US 9,603,009
- US 9,661,495
- US 9,681,251
- US 9,730,133
- US 9,736,318
- US 9,740,875
- US 9,743,271
- US 9,774,728
- US 9,805,208
- US 9,813,891
- US 9,819,578
- US 9,826,439
- US 9,838,536
- US 9,877,185
- US 9,900,845
- US 9,913,132
- US 9,992,326
- US 9,992,817
- US 10,002,345
- US 10,021,240
- US 10,097,593
- US 10,178,525

- US 10,237,402
- US 10,243,691
- US 10,268,530
- US 10,271,265
- US 10,306,433
- US 10,320,989
- US 10,341,929
- US 10,419,996
- US 10,455,071
- US 10,477,454
- US 10,506,398
- US 10,594,596
- US 10,624,011
- US 10,645,562
- US 10,798,629
- US 10,805,861
- US 10,841,240
- US 10,999,705
- US 11,032,709
- US 11,082,109
- US 11,178,272
- US 11,197,204
- US 11,218,769
- US 11,228,957
- US 11,395,216
- US 11,405,225
- US 11,405,916
- US 11,419,054
- US 11,448,726
- US 11,503,526
- US 11,503,526
- US 11,523,253
- US 11,586,952
- US 11,593,837
- US 11,690,006
- US 11,751,123
- US 11,870,476
- US 11,913,970
- US 11,956,628
- US 11,962,585
- US 11,984,566
- US 2005/0185611
- US 2006/0245405
- US 2006/0248566
- US 2007/0002837
- US 2007/0071006
- US 2007/0124608
- US 2009/0141682
- US 2010/0272049
- US 2012/0120962

- US 2013/0121214
- US 2013/0343343
- US 2014/0267599
- US 2015/0093991
- US 2015/0094045
- US 2015/0163715
- US 2017/0264657
- US 2018/0359674
- WO 2009/107582
- WO 2010/063119
- WO 2011/075825
- WO 2012/063491
- WO 2015/010199
- WO 2019/146996
- WO 2019/172044
- WO 2019/185506
- WO 2020/170221
- WO 2021/084519

The above applications for which the Asserted Patents were found to be relevant prior art include multiple applications filed by mobile telecommunications equipment companies, such as Apple, Nokia, Motorola, and Research in Motion; telephone carriers, such as, AT&T, Sprint, Qwest, Mitel, Vonage, and leading technology companies, such as IBM, Google, Qualcomm, Microsoft, Intel, and Dell.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:

Skepticism in the Industry: Several contemporaneous publications acknowledged the difficulty of developing a solution that the claimed invention solved. For example, articles before the priority date of the asserted patents discuss the difficulties in achieving truly seamless mobility, particularly increase in system load, high handover latency, packet loss, and quality of service degradation. These articles point out that despite theoretical progress, practical implementations often fall short due to hardware and software incompatibilities across network types. *See, e.g.*, [CITE - Challenges in the migration to 4G mobile systems].

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 9:

Separately for each Accused Product, describe all facts and bases concerning Plaintiff's first formation of a belief that the Accused Product was infringing, including but not limited to an identification of the date(s) on which Plaintiff or any attorney or agent acting on Plaintiff's

behalf first learned or became aware of each such Accused Product; the date(s) on which Plaintiff or any attorney or agent acting on Plaintiff's behalf first formed a belief that each such Accused Product allegedly infringed; investigations, reverse engineering, analyses, tests, or studies done on any of such Accused Products by or on the behalf of Plaintiff with respect to possible infringement of any claim of the Patents-in-Suit; each person with knowledge of the foregoing and an identification of all documents or privilege log entries relating to such awareness, testing, or belief; and the reasons why Plaintiff did not commence a suit alleging patent infringement between the date Plaintiff became so aware and the filing of the Complaint in this Action.

RESPONSE TO INTERROGATORY NO. 9:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "all facts and bases." Vasu objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and neither relevant nor proportional to the needs of this case including, for example, in its use of the phrase "all facts and bases," and "identification of all documents or privilege log entries relating to such awareness, testing, or belief." Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu determined that Defendants were practicing the asserted claims before filing this lawsuit. Vasu incorporates by references its Complaint and any documents cited therein, as well as its infringement contentions, as well as all subsequent amendments to the aforementioned documents.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9:

Vasu has provided all non-privileged information responsive to this interrogatory. Vasu's investigations into infringement of Defendant's Accused Products/Accused Galaxy Phone Functionalities is protected by attorney-client privilege and work product doctrine.

Notwithstanding the attorney-client privilege and work product doctrine, Vasu's date of first awareness is not relevant to any party's claim or defense given that Vasu is not seeking a pre-complaint willfulness infringement theory, laches is not available as a defense, and the damages period is limited to 6 years prior to the filing of the complaint, regardless of any knowledge of infringement.

INTERROGATORY NO. 13:

For each Asserted Claim and each Accused Product, state the complete factual and legal basis for any contention that Defendants indirectly infringe under 35 U.S.C. §§ 271(b)-(c) by knowingly and intentionally inducing or contributing to direct infringement. For clarity, this includes an identification of each activity You contend supports indirect infringement and the identity of the Person performing each such activity; an identification of all Persons with knowledge of and Documents relating to such activity; and an identification and detailed

description of all Documents and things evidencing and Persons knowledgeable about why the Accused Product is not a staple article or commodity of commerce suitable for substantial noninfringing use.

RESPONSE TO INTERROGATORY NO. 13:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "all Documents and things." Vasu objects to this Interrogatory as being compound and having multiple subparts, which should count toward the limits on Interrogatories. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Vasu objects to this Interrogatory to the extent that it is compound and/or contains multiple subparts. Vasu objects to this Interrogatory to the extent that it seeks information within Defendants' possession, custody or control. Vasu objects to this Interrogatory to the extent it purposes to impose any requirement or discovery obligation greater than and/or different from those set forth by the Federal Rules of Civil Procedure, the Local Rules of this Court, the Eastern District of Texas Patent Local Rules or orders of this Court governing these proceedings.

Vasu further objects to this Interrogatory as premature insomuch as it calls for information that is the subject of expert testimony or opinion. Vasu will provide expert reports in accordance with the Docket Control Order.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Defendants have induced infringement through activities demonstrating knowledge and intent to infringe. For example, Defendants' marketing materials and user manuals explicitly instruct users on how to use the feature for automatic switching from Wi-Fi to cellular switching based on signal strength thresholds and between Wi-Fi networks based on user preference settings, which infringes the Asserted Patent. Similarly, Defendants' marketing materials and user manuals explicitly instruct users on how to use the feature for selectively process content streams based on content parameters, which also infringe the Asserted Patents. Samsung's marketing team and technical writers created and distributed these materials. Relevant documents can include user manuals of the Accused Products, online help guides, and marketing materials. Similarly, Defendants' customer support representatives provide instructions and training to users on setting up and using the accused functionalities in a manner that infringes the patent. For example, customers can get assistance with using the accused functionalities by calling customer support at +1 (800) SAMSUNG (726-7864). Relevant documents can include customer support logs and customer service training materials. Further, internal communications among Samsung's employees discuss the patented technology and ways to implement it in the Accused Products. These communications involve the development teams of the Accused Functionalities. Relevant documents can include internal emails and meeting notes. Additionally, Defendants received a letter from Vasu on January 15, 2024, but continued to provide the accused functionalities without modification. This lack of modification demonstrates knowledge and intent, evidenced by this letter and continuing to release new products with infringing features.

Regarding contributory infringement, the one of the accused functionalities is specifically designed to perform automatic Wi-Fi and cellular network switching based on signal strength and user preferences, which directly aligns with the patented technology. Similarly, another accused functionality is selectively process broadband content transmitted to end user devices based on content parameters. These specialized functionalities are implemented by product development teams and are documented in product specifications and design documents. The primary purpose of these functionalities is based on the processes described in the Asserted Patents. These functionalities have no substantial non-infringing applications. Product specifications, design documents, source code, and system architecture documents demonstrate this process. The accused functionalities are deeply integrated into the device's operating system or firmware and cannot be easily separated or used independently of the patented method. Finally, the functionality of the accused feature relies on methods or processes explicitly covered by the patent, making it inseparable from the patented technology. This dependency is documented, for example, by the software development team in the source code, product specifications, and design documents.

Defendants have knowingly and intentionally induced infringement and contributed to direct infringement of the Asserted Claims through their activities, instructions, and integration of the Accused Functionalities. These activities and the accompanying exhibits demonstrate that the accused feature is not a staple article or commodity of commerce suitable for substantial non-infringing use.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13:

Vasu's response applies generally to all of the Asserted Claims and Accused Products. As previously noted, evidence of indirect infringement includes the publication and creation of marketing materials, user manuals, technical documents, help guides, training materials, and the like. Persons with knowledge of and Documents relating to Samsung's indirect infringement are Samsung's employees that, with respect to the Accused Products, (1) create marketing materials, (2) create user manuals, (3) create technical manuals, (4) create user interface or experience design, (5) assist users with operating or troubleshooting, (6) created or maintain the Accused Galaxy Products Functionalities, and (7) manage the teams the created or maintain the Accused Galaxy Products Functionalities.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 14:

Describe in detail any disclosure or commercial exploitation of the subject matter disclosed or claimed in any Asserted Patent prior to or after the claimed priority date of that Asserted Patent (whether or not secret or confidential), including each use for a commercial purpose, each disclosure to someone other than Plaintiff, and each sale or offer for sale.

RESPONSE TO INTERROGATORY NO. 14:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose

any privileged information. Vasu objects to this Interrogatory as seeking information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu objects to this Interrogatory to the extent that it is compound and/or contains multiple subparts. Vasu objects to this Interrogatory to the extent that it seeks information within Defendants' possession, custody or control. Vasu objects to this Interrogatory to the extent it purposes to impose any requirement or discovery obligation greater than and/or different from those set forth by the Federal Rules of Civil Procedure, the Local Rules of this Court, the Eastern District of Texas Patent Local Rules or orders of this Court governing these proceedings.

Vasu further objects to this Interrogatory as premature insomuch as it calls for information that is the subject of expert testimony or opinion. Vasu will provide expert reports in accordance with the Docket Control Order.

Vasu has not made any disclosure or commercial exploitation of the subject matter disclosed or claimed in any Asserted Patents with respect to any alleged infringer beyond Defendants.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 14:

Vasu incorporates by reference its response to Interrogatory No. 2.

Vasu and its predecessor entities did not (i) produce any products covering the claimed invention, (ii) license the Asserted Patents, (iii) sell the Asserted Patents (other than to related entities), (iv) sell itself to another entity, (v) nor engage in any litigation prior to this one. Vasu has worked with third-parties, under NDA, to develop infrastructure related to the Asserted Patents, but these attempts did not embody the Asserted Claims.

INTERROGATORY NO. 15:

Describe in complete detail each instance in which Plaintiff or any other person or entity has identified or given notice of the Asserted Patents to any Person or Entity, asserted that any Person or Entity, other than Defendants, practices any claim element of any Asserted or Related Patent and such Person's or Entity's response(s) thereto, and Plaintiff's response(s) to such response(s), including a description of all allegations by any Person or Entity that any claim of any Asserted or Related Patent is invalid or unenforceable and Plaintiff or its predecessors-in-interest's response thereto.

RESPONSE TO INTERROGATORY NO. 15:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

On January 15, 2024, Samsung received notice of its infringement of the Asserted Patents. The attorney-client privilege and work product doctrine prevents Vasu from identifying other instances in which Vasu has identified or given notice of the Asserted Patents to any other Person or Entity in which it asserts that such Person or Entity has practiced any claim element of any Asserted or Related Patent. Accordingly, Vasu cannot provide such Person's or Entity's response(s) thereto, nor Vasu's response(s) to such response(s) because they do not exist.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15:

Vasu has provided all non-privileged information responsive to this interrogatory. Vasu's investigations into infringement of other companies is protected by attorney-client privilege and work product doctrine. Other than to Samsung, Vasu has not given notice to or asserted that any person or entity practices any claim element of the Asserted or Related Patents.

INTERROGATORY NO. 19:

For any patent that claims priority to an earlier application, identify for each element of each Asserted Claim, by column, line, and/or figure number of each earlier application, all disclosure You contend provides written description and enablement support required by 35 U.S.C. § 112.

RESPONSE TO INTERROGATORY NO. 19:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest

doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it calls for information that is publicly available or equally available to Defendants, and therefore is of no greater burden for Defendants to obtain than for Vasu to obtain and produce. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this interrogatory to the extent it is overly broad, unduly burdensome, seek information not relevant to the claim or defense of any party, and are not proportional to the needs of this case. Vasu objects to this Interrogatory to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity. Vasu objects to the Interrogatory as calling for claim charts identifying "for each element of each Asserted Claim, by column, line, and/or figure number of each earlier application, all disclosure [Vasu] contend[s] provides written description and enablement support" within at least fourteen different patents, which is compound, unduly burdensome, and disproportionate to the needs of the case.

Vasu objects to this Interrogatory to the extent that it is compound and/or contains multiple subparts. Vasu objects to this Interrogatory to the extent that it seeks information within Defendants' possession, custody or control. Vasu objects to this Request to the extent it requires an application of claim terms whose scope is disputed and have yet to be construed by the Court. Vasu reserves the right to supplement this Response, if appropriate, after receiving the Court's claim construction order.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu incorporates by reference its response to Interrogatory No. 1. Furthermore, the Asserted Claims were duly issued by the USPTO and are presumed to be valid under 35 U.S.C. § 282. Defendants bears the burden of establishing invalidity with clear and convincing evidence. Vasu is not required to affirmatively prove enablement and written description as this Interrogatory suggests. *Ormco Corp. v. Align Tech., Inc.*, 498 F.3d 1307, 1318 (Fed. Cir. 2007) ("The party alleging invalidity for lack of enablement bears the burden of proving by clear and convincing evidence that the specification of a challenged patent fails to teach one of ordinary skill in the art how to make the invention."); *Hynix Semiconductor Inc. v. Rambus Inc.*, 645 F.3d 1336, 1351 (Fed. Cir. 2011) ("To overcome the presumption of validity of patents, the accused must show that the claims lack a written description by clear and convincing evidence."). Samsung has yet to provide invalidity contentions. Accordingly, Defendants have not discharged their burden of demonstrating by clear and convincing evidence that the Asserted Claims are unsupported by their specifications. Thus, Defendants have not presented evidence that calls into question whether the Asserted Patents are valid for lack of § 112 support.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 19:

In response to Defendant's July 31, 2024 Preliminary Invalidity Contentions, Vasu provides exemplary support, illustrating the Asserted Claims are supported by the specification.

‘181 Patent`

Indefiniteness

Phrase	Support
“when the signal strength drops below a predetermined threshold” (claim 1)	Fig. 3, Fig. 4, 3:7-22, 8:9-17, 8:49-60, 10:27-33, 11:1-24, 12:14-22, 12:54-67
“different types of wireless networks” (claim 1)	Fig. 1, 1:38-2:45, 2:49-3:32, 4:50-5:3, 5:35-38, 6:6-14, 7:5-14, 7:18-21
“[first/second] type of wireless network” (claims 1, 3, 8, 9)	2:49-3:32, 4:50-5:3, 5:35-38, 6:6-14, 7:4-14, 7:18-21
“the second type of wireless network” (claim 1)	2:49-3:32, 4:50-5:3, 5:35-38, 6:6-14, 7:5-14, 7:18-21

Written Description

Phrase	Support
“when the signal strength drops below a predetermined threshold, notifying an interface server with the mobile communication device and establishing a second communication link between the interface server and the end destination device without disrupting the first communication link;” (claim 1)	Abstract, Fig. 2, Fig. 3, 2:49-54, 2:58-3:3, 3:7-22, 8:18-21, 8:49-58, 9:4-16, 10:27-33, 13:55-14:29
“re-directing the second communication link from the interface server to the mobile communication device, thereby establishing a second wireless communication link between the mobile communication device and the second type of wireless network.” (claim 1)	Abstract, Fig. 2, Fig. 3, 2:49-67, 4:29-5:19, 8:49-9:16, 10:10-67, 13:55:14:29

Enablement

Phrase	Support
“monitoring a signal strength of the first wireless communication link;” (claim 1)	Fig. 2, 2:58-63, 3:7-16, 6:64-7:5, 8:9-9:16, 10:10-31

"re-directing the second communication link from the interface server to the mobile communication device, thereby establishing a second wireless communication link between the mobile communication device and the second type of wireless network" (claim 1).	Abstract, Fig. 2, Fig. 3, 2:49-67, 4:29-5:19, 8:49-9:16, 10:10-67, 13:55:14:29

<u>'154 Patent</u>

Indefiniteness

Phrase	Support
"when a second context is preferred over the context of the first communication link, notifying an interface server and establishing a second communication link between the interface server and the end destination device without disrupting the first communication link, with a client" (claim 1)	Abstract, Fig. 2, 2:54-3:27, 8:26-30, 8:58-9:26, 9:14-26, 10:21-11:10, 12:3-48, 12:66-13:33
"the first communication link" (claims 1, 43)	Fig. 2, 2:54-3:37, 4:35-5:38, 9:14-26
"the second communication link" (claim 2)	Fig. 2, 2:54-3:37, 4:35-5:38, 9:14-26
"when a second network is detected as available and a second context of a second communication link corresponding to the second network is preferable, notifying an interface server and establishing a second communication link between the interface server and the end destination device without disrupting the first communication link, with the client" (claim 43)	Abstract, Fig. 2, 2:54-3:27, 8:26-30, 8:58-9:26, 9:14-26, 10:21-11:10, 12:3-48, 12:66-13:33

Written Description

Phrase	Support
"when a second context is preferred over the context of the first communication link, notifying an interface server and	Abstract, Fig. 2, 2:54-3:27, 8:26-30, 8:58-9:26, 9:14-26, 10:21-11:10, 12:3-48, 12:66-13:33

establishing a second communication link between the interface server and the end destination device without disrupting the first communication link, with a client;" (claim 1)	
"re-directing the second communication link from the interface server to the mobile communication device, thereby establishing a second communication link between the mobile communication device and a second network, wherein the second network is within a set of known networks or from a newly discovered network." (claim 1)	Abstract, Fig. 2, 2:54-5, 4:35-5:26, 8:17-9:26, 10:21-11:10
"when a second network is detected as available and a second context of a second communication link corresponding to the second network is preferable, notifying an interface server and establishing a second communication link between the interface server and the end destination device without disrupting the first communication link, with the client;" (claim 43)	Abstract, Fig. 2, 2:54-3:27, 8:26-30, 8:58-9:26, 9:14-26, 10:21-11:10, 12:3-48, 12:66-13:33
"re-directing, with the client, the second communication link from the interface server to the communication device, thereby establishing a second communication link between the communication device and the second network, wherein the second network is within a set of known networks or from a newly discovered network." (claim 43)	Abstract, Fig. 2, 2:54-5, 4:35-5:26, 8:17-9:26, 10:21-11:10
"The method of claim 46 wherein the packet network comprises packet switched telephone network." (claim 47)	Fig. 2, 6:10-61, 7:28-9:26

Enablement

Phrase	Support
"monitoring a context of the first communication link;" (claim 1)	Fig. 2, 2:63-3:1, 3:12-21, 7:2-11, 8:17-9:26, 10:21-41

"monitoring, with the client, a first context of a signal of the first communication link, wherein the first context comprises signal strength characteristics;" (claim 43)	Fig. 2, 2:63-3:1, 3:12-21, 7:2-11, 8:17-9:26, 10:21-41
"re-directing the second communication link from the interface server to the mobile communication device, thereby establishing a second communication link between the mobile communication device and a second network, wherein the second network is within a set of known networks or from a newly discovered network." (claim 1)	Abstract, Fig. 2, 2:54-5, 4:35-5:26, 8:17-9:26, 10:21-11:10
"re-directing, with the client, the second communication link from the interface server to the communication device, thereby establishing a second communication link between the communication device and the second network, wherein the second network is within a set of known networks or from a newly discovered network." (claim 43)	Abstract, Fig. 2, 2:54-5, 4:35-5:26, 8:17-9:26, 10:21-11:10

<u>'281 Patent</u>

Indefiniteness

Phrase	Support
"wherein switching is based on detecting a second context being preferred over the context within a set of networks" (claim 1)	Abstract, Figs. 1-3, 2:41-67, 3:12-32, 4:43-56, 5:1-21, 5:58-6:27, 6:46-7:14, 7:31-36
"wherein switching is based on detecting a second context being preferred over the context within a set of known networks or from a newly discovered network" (claim 23)	Abstract, Figs. 1-3, 2:41-67, 3:12-32, 4:43-56, 5:1-21, 5:58-6:27, 6:46-7:14, 7:31-36
"wherein switching is based on detecting a second context being preferred over the context within a set of known networks" (claim 37)	Abstract, Figs. 1-3, 2:41-67, 3:12-32, 4:43-56, 5:1-21, 5:58-6:27, 6:46-7:14, 7:31-36

"when a network is detected as available with a second communication link with a context preferable to the first communication link" (claim 45)	Abstract, Figs. 1-3, 2:41-67, 3:12-32, 4:43-56, 5:1-21, 5:58-6:27, 6:46-7:14, 7:31-36
"wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 1)	Abstract, Figs. 1-3, 3:12-32, 5:1-20, 6:59-7:14
"activating a timer to establish a first time window of a first predefined size T1 based on the detected first context;" (claim 12)	Abstract, Figs. 1-2, 2:54-60, 3:58-62, 4:43-49, 5:58-6:1, 6:9-14
"automatically switching a communication in progress via a wireless network to a communication via a Wi-Fi network based on the second detected context;" (claim 12)	Abstract, Figs. 1-3, 2:36-67, 3:12-32, 3:55-67, 4:43-56, 6:15-27
"establishing a second time window of a second predefined size T2 if the third detected context falls below a second predefined threshold value Vth2;" (claim 12)	Abstract, Figs. 1-3, 3:12-32, 5:1-20, 6:11-14, 6:46-7:21
"continuing a Wi-Fi communication without change if the fourth detected context is equal to or greater than a third predefined threshold value Vth3, wherein Vth3 is smaller than Vth2." (claim 12)	Abstract, Figs. 1-3, 3:12-32, 5:1-20, 6:11-14, 6:46-7:21
"wherein if the context does not change" (claim 23)	Abstract, Figs. 1-3, 2:54-67, 4:43-56, 5:1-20, 6:15-35
"wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 23)	Abstract, Figs. 1-3, 2:54-60, 3:12-32, 3:58-62, 4:43-49, 5:1-20, 5:58-6:1, 6:9-14, 6:59-7:14

"activating, with the server, a timer to establish a first time window of a first predefined size T1 if the detected first signal level is greater than a first predefined threshold value;" (claim 31)	Abstract, Figs. 1-2, 2:54-60, 3:58-62, 4:43-49, 5:58-6:1, 6:9-14, 7:37-44
"if the second detected signal level falls below the first predefined threshold value, then searching for alternative Wi-Fi signals having signal level above the first predefined threshold value, with the server;" (claim 31)	Abstract, Figs. 1-3, 2:41-67, 3:12-32, 4:43-56, 5:1-21, 5:58-6:27, 6:46-7:14, 7:31-36
"if an alternative signal level is above the first predefined threshold value, then switching a Wi-Fi communication in progress to a source of the alternative Wi-Fi signal, with the server; and" (claim 31)	Abstract, Figs. 1-3, 2:36-67, 3:12-32, 3:55-67, 4:43-56, 6:15-27
"if no alternative signal level is above the first predefined threshold value, then switching a Wi-Fi communication in progress to the wireless network, with the server, wherein if a signal monitor detects that the alternative signal level is below a second predefined threshold value, a timer is activated to establish a second time window of a second predefined size, wherein a third predefined threshold value is smaller than a second predefined threshold value." (claim 31)	Abstract, Figs. 1-3, 3:12-32, 5:1-20, 6:59-7:14
"wherein the timer is activated to establish a time window of a predefined size, wherein if the monitor detects that a signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 37)	Abstract, Figs. 1-3, 2:54-60, 3:12-32, 3:58-62, 4:43-49, 5:1-20, 5:58-6:1, 6:9-14, 6:59-7:14
"wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined	Abstract, Figs. 1-3, 2:54-60, 3:12-32, 3:58-62, 4:43-49, 5:1-20, 5:58-6:1, 6:9-14, 6:59-7:14

threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 45)	

Written Description

Phrase	Support
"detecting a fourth context during the second time window; and" (claim 12)	Abstract, Figs. 1-3, 2:54-67, 3:12-18, 4:43-56, 5:1-20, 5:58-6:35, 6:46-7:21
"continuing a Wi-Fi communication without change if the fourth detected context is equal to or greater than a third predefined threshold value Vth3, wherein Vth3 is smaller than Vth2." (claim 12)	Abstract, Figs. 1-3, 2:54-67, 3:12-18, 4:43-56, 5:1-20, 5:58-6:35, 6:46-7:21
"when a network is detected as available with a second communication link with a context preferable to the first communication link, notifying an interface server and establishing the second communication link between the interface server and an end destination device without disrupting the first communication link and" (claim 45)	Abstract, Figs. 1-3, 2:36-3:45, 3:55-67, 4:27-6:35, 6:46-7:21
"re-directing the second communication link from the interface server to a mobile communication device, thereby establishing the second communication link between the communication device and a second network, wherein upon activation of a timer, a switching system causes a second communication module to change state from a sleep mode to an active mode, wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third	Abstract, Figs. 1-3, 2:36-3:45, 3:55-67, 4:27-6:35, 6:46-7:21,

predefined threshold value Vth3 is smaller than Vth2." (claim 45)	

Enablement

Phrase	Support
"a switching system to switch operation between a first communication module and a second communication module, wherein during an established communication if a context changes, the established communication is switched to a second communication over a second network, wherein switching is based on detecting a second context being preferred over the context within a set of networks, wherein upon activation of a timer, the switching system causes the second communication module to change state from a sleep mode to an active mode, wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 1)	Abstract, Figs. 1-3, 2:36-3:45, 3:55-4:26, 4:43-5:20, 5:33-6:27, 6:46-7:20
"determining a first context;" (claim 12)	Figs. 1-3, 2:54-67, 3:13-33, 3:55-67, 4:14-26, 4:44-56, 5:1-20, 5:58-6:27, 6:46-63
"determining a second context during the first time window;" (claim 12)	Figs. 1-3, 2:54-67, 3:13-33, 3:55-67, 4:14-26, 4:44-56, 5:1-20, 5:58-6:27, 6:46-63
"detecting a third context;" (claim 12)	Figs. 1-3, 2:54-67, 3:13-33, 3:55-67, 4:14-26, 4:44-56, 5:1-20, 5:58-6:27, 6:46-63
"detecting a fourth context during the second time window; and (claim 12)	Figs. 1-3, 2:54-67, 3:13-33, 3:55-67, 4:14-26, 4:44-56, 5:1-20, 5:58-6:27, 6:46-63

"a switching system to switch operation between the first communication module and the second communication module, wherein if a context changes, the second communication module is activated and a second communication type is initiated, wherein if the context does not change, the second communication type is continued without switching, wherein switching is based on detecting a second context being preferred over the context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the switching system causes the second communication module to change state from a sleep mode to an active mode, wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 23)	Abstract, Figs. 1-3, 2:36-3:45, 3:55-4:26, 4:43-5:20, 5:33-6:27, 6:46-7:20
"if no alternative signal level is above the first predefined threshold value, then switching a Wi-Fi communication in progress to the wireless network, with the server, wherein if a signal monitor detects that the alternative signal level is below a second predefined threshold value, a timer is activated to establish a second time window of a second predefined size, wherein a third predefined threshold value is smaller than a second predefined threshold value." (claim 31)	Abstract, Figs. 1-3, 3:12-32, 5:1-20, 6:59-7:14
"a switching system to switch operation between a first communication module and a second communication module, wherein during an established communication if a monitor detects that a context changes, the established communication is switched to a second communication over a network,	Abstract, Figs. 1-3, 2:36-3:45, 3:55-4:26, 4:43-5:20, 5:33-6:27, 6:46-7:20, 7:30-36

wherein switching is based on detecting a second context being preferred over the context within a set of known networks, wherein upon activation of a timer, the switching system causes the second communication module to change state from a sleep mode to an active mode, wherein the timer is activated to establish a time window of a predefined size, wherein if the monitor detects that a signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 37)	
"monitoring a context of a first communication link;" (claim 45)	
"re-directing the second communication link from the interface server to a mobile communication device, thereby establishing the second communication link between the communication device and a second network, wherein upon activation of a timer, a switching system causes a second communication module to change state from a sleep mode to an active mode, wherein the timer is activated to establish a time window of a predefined size, wherein if a Wi-Fi signal monitor detects that a Wi-Fi signal level is below a second predefined threshold value Vth2, the timer is activated to establish a second time window of a second predefined size T2, wherein a third predefined threshold value Vth3 is smaller than Vth2." (claim 45)	Abstract, Figs. 1-3, 2:36-3:45, 3:55-67, 4:27-6:35, 6:46-7:21

‘996 Patent

Indefiniteness

Phrase	Support
“wherein if a context changes for known networks or a new network is detected with a more favorable context” (claim 1)	7:42-8:17, 8:64-9:9
“wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network” (claims 12, 23, 25, 34)	2:42-3:6, 4:10-31, 4:48-61, 5:38-6:32, 7:42-8:17, 8:64-9:9
“wherein during an established communication if a preferable context is determined, the established communication is switched to a second communication over a network, wherein the preferable context is found in a set of known networks or in a newly discovered network” (claim 35)	2:42-3:6, 4:10-31, 4:48-61, 5:38-6:32, 7:42-8:17, 8:64-9:9
“when a network is detected as available with a second wireless communication link with a context preferable to the first wireless communication link” (claim 41)	2:42-3:6, 4:10-31, 4:48-61, 5:38-6:32, 7:42-8:17, 8:64-9:9
“newly discovered network” (claims 12, 23, 25, 34, 35)	7:42-8:17, 8:64-9:9
“sleep mode” (claims 1, 12, 23, 25, 34, 35, 39, 41)	3:7-18, 3:39-50, 4:2-5, 5:26-37, 6:2-10
“stand-by mode” (claims 1, 12, 23, 25, 34, 35, 39, 41)	3:7-18, 3:39-50, 4:2-5, 5:26-37, 6:2-10
“active mode” (claims 1, 12, 23, 25, 34, 35, 39, 41)	3:7-18, 3:39-50, 4:2-5, 5:26-37, 6:2-10

Written Description

Phrase	Support
"automatically switching, with a server, a communication in progress via a wireless network to a communication via a network based on the second context, wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the server causes a communication module to change state from a sleep mode to a stand-by mode, and the server causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 12)	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54
"automatically switching, with a server, a communication in progress via a first network to a communication via a second network based on the second detected context, wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the server causes a communication module to change state from a sleep mode to a stand-by mode, and the server causes the second communication module to change state from the stand-by mode to an active mode before the communication is switched to the communication module." (claim 23)	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54
"A server device comprising: a switching system to switch operation between a communication module and a Wi-Fi communication module, wherein based on a first context and a second context, a communication automatically switches accordingly, wherein automatically	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54

switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the switching system causes the Wi-Fi communication module to change state from a sleep mode to a stand-by mode, and the switching system causes the Wi-Fi communication module to change state from the stand-by mode to an active mode before the communication is switched to the Wi-Fi communication module." (claim 34)	
"when the signal strength drops below a threshold, notifying an interface server and establishing a second communication link between the interface server and the end destination device without disrupting the first communication link;" (claim 39)	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32
"re-directing the second communication link from the interface server to another mobile communication device, thereby establishing a second wireless communication link between the mobile communication device and a second wireless network, wherein upon activation of a timer, the mobile communication device causes a communication module to change state from a sleep mode to a stand-by mode, and the mobile communication device causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 39)	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32
"when a network is detected as available with a second wireless communication link with a context preferable to the first wireless communication link, notifying an interface and establishing the second communication link between the interface and an end destination device without	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32, 7:42-9:9

disrupting the first communication link; and" (claim 41)	
"re-directing the second communication link from the interface to a mobile communication device, thereby establishing the second wireless communication link between the mobile communication device and a second wireless network, wherein upon activation of a timer, the interface causes a communication module to change state from a sleep mode to a stand-by mode, and the interface causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 41)	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32

Enablement

Phrase	Support
"a switching system to switch operation between a first communication module and a second communication module, wherein if a context changes for known networks or a new network is detected with a more favorable context, a previously established communication automatically switches accordingly, wherein upon activation of a timer, the switching system causes the second communication module to change state from a sleep mode to a stand-by mode, and the switching system causes the second communication module to change state from the stand-by mode to an active mode before a communication is switched to the second communication module" (claim 1)	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54
"detecting a first context;" (claim 12)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9
"detecting a second context; and" (claim 12)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9

"automatically switching, with a server, a communication in progress via a wireless network to a communication via a network based on the second context, wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the server causes a communication module to change state from a sleep mode to a stand-by mode, and the server causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 12)	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54
"automatically switching, with a server, a communication in progress via a first network to a communication via a second network based on the second detected context, wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the server causes a communication module to change state from a sleep mode to a stand-by mode, and the server causes the second communication module to change state from the stand-by mode to an active mode before the communication is switched to the communication module." (claim 23)	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54
"determining a first context;" (claims 23, 25)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9
"determining a second context; and" (claims 23, 25)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9
"A server device comprising: a switching system to switch operation between a communication module and a Wi-Fi communication module, wherein based on a first context and a second context, a	Abstract, Figs. 1-3, 2:42-3:12, 2:60-3:29, 4:48-6:32, 6:41-7:19, 7:27-35, 7:42-8:17, 8:64-9:9, 9:34-54

communication automatically switches accordingly, wherein automatically switching is based on detecting the second context being preferred over the first context within a set of known networks or from a newly discovered network, wherein upon activation of a timer, the switching system causes the Wi-Fi communication module to change state from a sleep mode to a stand-by mode, and the switching system causes the Wi-Fi communication module to change state from the stand-by mode to an active mode before the communication is switched to the Wi-Fi communication module." (claim 34)	
"monitoring a signal strength of the first wireless communication link;" (claim 39)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9
"re-directing the second communication link from the interface server to another mobile communication device, thereby establishing a second wireless communication link between the mobile communication device and a second wireless network, wherein upon activation of a timer, the mobile communication device causes a communication module to change state from a sleep mode to a stand-by mode, and the mobile communication device causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 39)	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32
"monitoring a context of a first wireless communication link;" (claim 41)	Abstract, Figs. 1-3, 2:60-3:6, 3:60-4:5, 4:48-61, 5:5-25, 5:63-6:32, 6:51-19, 7:42-8:17, 8:64-9:9
"when a network is detected as available with a second wireless communication link with a context preferable to the first wireless communication link, notifying an interface and establishing the second	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32, 7:42-9:9

communication link between the interface and an end destination device without disrupting the first communication link; and" (claim 31)	
"re-directing the second communication link from the interface to a mobile communication device, thereby establishing the second wireless communication link between the mobile communication device and a second wireless network, wherein upon activation of a timer, the interface causes a communication module to change state from a sleep mode to a stand-by mode, and the interface causes the communication module to change state from the stand-by mode to an active mode before a communication is switched to the communication module." (claim 41)	Abstract, Figs. 1-3, 2:47-57, 2:60-3 38, 3:60-4:5, 4:19-29, 4:48-6:32, 6:41-7:19, 7:27-32

INTERROGATORY NO. 20:

Identify and describe in detail any discussions Vasu has had with any party regarding acquiring Vasu, including but not limited to, when the discussions took place, what offers were made, any statements by either party related to the value of Vasu, and any statements made by either party related to the value of the Patents-in-Suit.

RESPONSE TO INTERROGATORY NO. 20:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu is not aware of any discussions of Vasu approaching any party regarding interest in acquiring Vasu. Accordingly, no details exist regarding when the discussions took place, what offers were made, any statement by either party related to the value of Vasu, or any statement made by either party related to the value of the Patents-in-Suit.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 20:

Vasu is aware of one instance of a company approaching Vasu to purchase its predecessor entity—Vasu Networks Corp. On October 13, 2014, Mr. David Ryan from Upton Financial Group, Inc. approached Mr. Ganesan and expressed interest, on behalf of an unnamed buyer, in purchasing Vasu Networks Corp. Mr. Ganesan promptly responded that Vasu was not not selling the company. Mr. Ryan responding that he will speak to the buyer this afternoon and will let them know that there is no interest on your part. No other exchanges were made between the parties.

INTERROGATORY NO. 21:

Identify and describe in detail all attempts by Vasu to develop technology for any Third Party.

RESPONSE TO INTERROGATORY NO. 21:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from

disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory as seeking information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particularly given the use of the phrase "all attempts." Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu has not developed or attempted to develop technology for any Third Party that did or would have embodied the Asserted Claims.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 21:

Vasu confirms that Vasu has not developed or attempted to develop technology for any Third Party.

INTERROGATORY NO. 22:

Identify all investors in Vasu, the amount of their investment, and what they received in exchange for their investment.

RESPONSE TO INTERROGATORY NO. 22:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it is vague and

ambiguous, particularly given the use of the phrases "investors" and "investment." Vasu objects to this Interrogatory as seeking information that is irrelevant, immaterial or not reasonably calculated to lead to the discovery of admissible evidence. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu is wholly owned by Vasudevan Ganesan.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 22:

Vasudevan Ganesan is the sole stock holder in Vasu and controls the entity. Any shareholders or investors in predecessor entities are not relevant to this action.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 25:

Separately for each Asserted Claim, state whether you contend the Asserted Claim or any portion of the Asserted Claim is essential to any standard, including without limitation 802.11, and identify the specific portions of the respective standard to which the Asserted Claim is alleged to be essential.

RESPONSE TO INTERROGATORY NO. 25:

Vasu incorporates its General Objections and Objections to Definitions and Instructions by reference. Vasu objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity; Vasu will not disclose any privileged information. Vasu objects to this Interrogatory to the extent it calls for information that is publicly available or equally available to Defendants, and therefore is of no greater burden for Defendants to obtain than for Vasu to obtain and produce. Vasu objects to this Interrogatory to the extent it calls for a legal conclusion. Vasu objects to this Interrogatory to the extent it is vague and ambiguous, particular with respect to "essential to any standard."

Vasu further objects to this Interrogatory as premature insomuch as it calls for information that is the subject of expert testimony or opinion. Vasu will provide expert reports in accordance with the Docket Control Order.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, Vasu responds as follows:

Vasu has not performed any element-by-element analysis regarding whether any of the Asserted Patents are essential to any standard, and, as such, is unaware of whether any Asserted Claims are essential to any standard. Vasu incorporates by reference its Infringement Contentions with respect to any standards that may be relevant to Defendant's infringement.

Vasu's investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it. Discovery is ongoing. Vasu reserves the right to supplement its response pursuant to Fed. R. Civ. P. 26(e).

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 25:

Vasu does not allege that any of the Asserted Claims are essential to a standard. As noted in the specification, the inventions in the Asserted Claims are technologies that use communication networks including wireless cellular networks (e.g., GSM, CDMA), circuit-switched networks (e.g., PSTN), and Wi-Fi networks. These communication networks are compliant with international standardization to facilitate the development of such networks and inter-operation between peer networks from different operators or connections with the legacy networks specified. Accordingly, the inventions in the Asserted Claims are not directed at the standardization of the communication networks.

Dated: September 27, 2024

By: */s/ Kristopher Kastens*

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2024, a complete copy of the foregoing **PLAINTIFF VASU HOLDINGS, LLC'S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANTS SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC.'S INTERROGATORIES (NOS. 1-5, 8, 9, 13-15, 19-22, 25)** was served via electronic mail upon the following counsel of record for Defendant Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.:

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