

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC and	)	
INTELLECTUAL VENTURES II LLC,	)	
	)	
<i>Plaintiffs,</i>	)	C.A. No. 4:24-cv-00980-ALM
	)	
v.	)	
	)	JURY TRIAL DEMANDED
AMERICAN AIRLINES, INC.	)	
	)	
<i>Defendant.</i>	)	

**PLAINTIFFS' OBJECTIONS AND RESPONSES TO DEFENDANT AMERICAN
AIRLINES, INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-18)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, "IV" or "Plaintiffs") through its undersigned counsel, hereby provide the following objections and responses to Defendant American Airlines, Inc.'s ("American" or "Defendant") First Set of Interrogatories (Nos. 1-18).

GENERAL OBJECTIONS

1. All General Objections are hereby incorporated into each specific response. Any objection or lack of objection to any portion of an interrogatory is not to be deemed an admission.
2. IV objects to each and every definition, instruction, and/or interrogatory to the extent it purports to impose duties or obligations upon IV in excess of or different from the rules and obligations imposed by the Federal Rules of Civil Procedure, the Local Rules for the Eastern District of Texas, and any other rules or applicable law.
3. IV objects to each and every definition, instruction, and/or interrogatory as overly broad, unreasonably burdensome, and oppressive to the extent it seeks, individually or collectively,

**OBJECTIONS AND RESPONSES TO
DEFENDANT'S INTERROGATORIES (NOS. 1-18)**

INTERROGATORY NO. 1:

For each Patent-in-Suit, identify and describe in detail all agreements (including, but not limited to, licenses, assignments, and covenants not to sue) or offers to make an agreement between You (or any of Your predecessors in interest to the Patents-in-Suit) and any third party relating to any Patent-in-Suit, and for each agreement or offer to make an agreement, identify and describe in detail all related facts and circumstances, including but not limited to: dates on which negotiations began and ended; all Persons involved with negotiations or the decision to negotiate; all Documents exchanged during negotiations; all proposed financial terms, whether accepted or not; all final financial terms; any terms or bases on which such proposed or final terms were calculated; any other consideration or value to be paid or given in the agreement; any payments made or received; the terms or basis on which such proposed royalty or royalty rate was calculated; any royalty or royalty rate offered; any apportionment of a portfolio-wide rate down to the Patent-in-Suit; and any supporting or associated Documentation or agreement(s).

RESPONSE TO INTERROGATORY NO. 1:

IV incorporates by reference each of its General Objections as if set forth separately here in full. IV objects to this interrogatory to the extent it is vague, overbroad, ambiguous, unduly burdensome, oppressive, and not proportional to the needs of this case as it is not limited in time or scope and/or imposes burdens and obligations different from and beyond those imposed by the local rules of the Eastern District of Texas or those the Federal Rules of Civil Procedure. IV objects to this interrogatory as calling for speculation and subject to multiple interpretations. IV objects to this interrogatory to the extent it calls for legal conclusions. IV further objects to this interrogatory to the extent it seeks documents outside the possession, custody, or control of IV. IV objects to this interrogatory to the extent it seeks information subject to third-party confidentiality restrictions. IV objects to this interrogatory to the extent it seeks non-discoverable information and materials about negotiations. IV objects to this interrogatory to the extent it improperly seeks IV to marshal all its available proof and limit the evidence that IV may present at trial of this matter. IV objects to this interrogatory as compound to the extent it contains discrete subparts that each count separately toward the total number of interrogatories allowed by the Court's Standing Order Governing

Proceedings (Patent Case) (Dkt. 17). IV objects to this interrogatory to the extent it seeks information that is protected by the attorney-client privilege, the attorney work-product immunity, settlement privilege, and/or other applicable privilege or immunity from discovery. IV hereby applies all such privileges and/or immunities.

Subject to and without waiving the foregoing objections and to the extent IV understands this interrogatory, IV responds as follows: IV intends to produce relevant license agreements, subject to the requisite third-party permissions pursuant to the agreements and in accordance with Rule 33(d) of the Federal Rules of Civil Procedure. IV also refers American to its Initial Disclosures served on April 18, 2025, which identify persons with knowledge concerning the licensing of the Asserted Patents.

Discovery and IV's investigation in this case are ongoing, and IV expressly reserves the right to amend and/or supplement this response, if necessary, as further information is discovered in this matter.

INTERROGATORY NO. 2:

Identify each valuation of a Patent-in-Suit, or any claim therein, including any valuation of groups or portfolios of patents that include one or more Patent-in-Suit, including any monetary valuation of any Patent-in-Suit (or group or portfolio containing such Patent(s)-in-Suit) and an identification of the date of such valuation, all persons involved in such valuation, and all documents relating to such valuation.

RESPONSE TO INTERROGATORY NO. 2:

IV incorporates by reference each of its General Objections as if set forth separately here in full. IV objects to this interrogatory to the extent it is vague, overbroad, ambiguous, unduly burdensome, oppressive, and not proportional to the needs of this case as it is not limited in time or scope and/or imposes burdens and obligations different from and beyond those imposed by the local rules of the Eastern District of Texas or the Federal Rules of Civil Procedure. IV objects to this interrogatory as calling for speculation, subject to multiple interpretations, vague and ambiguous in