

EXHIBIT 2012

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FERID ALLANI,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:24-CV-304-ADA

**PLAINTIFF FERID ALLANI'S
OBJECTIONS AND RESPONSES TO
DEFENDANT APPLE INC.'S FIRST SET
OF REQUESTS FOR
INTERROGATORIES (NOS. 1-8).**

CERTIFICATE OF SERVICE

I certify that I have caused PLAINTIFF FERID ALLANI'S OBJECTIONS AND RESPONSES TO DEFENDANT APPLE INC.'S FIRST SET OF REQUESTS FOR INTERROGATORIES (Nos. 1-8) to be served on all counsel of record via electronic mail.

Dated: July 7, 2025

/s/ Lewis E. Hudnell, III
Lewis E. Hudnell, III

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ALLANI.COM, INC.,
Plaintiff,
v.
APPLE, INC.,
Defendant.

Case No. 6:24-CV-00304-ADA

**PLAINTIFF ALLANI.COM, INC.'S OBJECTIONS AND RESPONSES TO DEFENDANT
APPLE INC.'S FIRST SET OF REQUESTS FOR PRODUCTION
(NOS. 1-47)**

Under Federal Rules of Civil Procedure 26 and 33, Plaintiff Ferid Allani (“Allani” or “Plaintiff”) provides the following objections and responses to Defendant Apple Inc. (“Apple”) First Set of Production (Nos. 1-47).

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. Allani objects to Apple’s definition of the terms “Plaintiff,” “Allani,” “You,” and “Your” to the extent that it includes individuals and entities other than Allani and/or requires the production of materials not within the possession, custody, or control of Allani.

2. Allani objects to Apple’s definition of the terms “Secureinfor” to the extent that it includes individuals and entities other than Allani and/or requires the production of materials not within the possession, custody, or control of Allani.

3. Allani objects to Apple’s definition of the terms “All Net” to the extent that it includes individuals and entities other than Allani and/or requires the production of materials not within the possession, custody, or control of Allani.

CERTIFICATE OF SERVICE

I certify that I have caused PLAINTIFF FERID ALLANI'S OBJECTIONS AND RESPONSES TO DEFENDANT APPLE INC.'S FIRST SET OF REQUESTS FOR PRODUCTION (NOS. 1-47) and the accompanying documents to be served on all counsel of record via electronic mail.

Dated: July 7, 2025

/s/ Lewis E. Hudnell, III
Lewis E. Hudnell, III

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

FERID ALLANI,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No.: 6:24-cv-304-ADA

JURY TRIAL DEMANDED

**DEFENDANT APPLE INC.'S OBJECTIONS AND RESPONSES TO
PLAINTIFF FERID ALLANI'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS (NOS. 1-33)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and applicable Local Rules, Defendant Apple Inc. ("Defendant" or "Apple") hereby objects and responds to Plaintiff Ferid Allani's ("Allani's") First Set of Requests for Production (Nos. 1-33), served on May 6, 2025. Apple provides these responses based on a reasonable investigation and on information currently available to Apple.

By responding to Plaintiff's Requests, Apple does not waive any objection that may be applicable to the use, for any purpose, by Plaintiff of any information or documents given in response to Plaintiff's Requests or the admissibility, privilege, relevancy, authenticity, or materiality of any of the information or documents to any issue in this case. Apple expressly reserves the right to object to the use of these responses, the subject matter contained herein, or the documents produced in connection herewith during any subsequent proceeding, including the trial of this or any other action.

Dated: June 5, 2025

/s/ Steven J. Wingard

Anna E. Dwyer
Garland T. Stephens
John P. Brinkmann
Melissa Hotze
Blue Peak Law Group, LLP
3139 Holcombe Blvd, Pmb 8160
Houston, TX 77025
772-631-6460
anna@bluepeak.law
garland@bluepeak.law
john@bluepeak.law
hotze@bluepeak.law

Steven J. Wingard
Robert Pierce Earle
Stephen Burbank
Scott Douglass & McConnico LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
(512) 495-6300
Fax: (512) 474-0731
swingard@scottdoug.com
rearle@scottdoug.com
sburbank@scottdoug.com

ATTORNEYS FOR DEFENDANT
APPLE INC.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record were served with a copy of the foregoing document
via electronic mail on June 5, 2025.

/s/ Steven J. Wingard

Steven J. Wingard

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

FERID ALLANI,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No.: 6:24-cv-304-ADA

JURY TRIAL DEMANDED

**DEFENDANT APPLE INC.'S RESPONSES TO
PLAINTIFF'S FRIST SET OF INTERROGATORIES (NOS. 1-17)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and applicable Local Rules, Defendant Apple Inc. ("Defendant" or "Apple") hereby objects and responds to Plaintiff Ferid Allani's ("Allani") First Set of Requests for Interrogatories (Nos. 1-17) Apple provides these responses based on a reasonable investigation and on information currently available to Apple.

By responding to Plaintiff's Interrogatories, Apple does not waive any objection that may be applicable to the use, for any purpose, by Plaintiff of any information or documents given in response to Plaintiff's Interrogatories, or the admissibility, privilege, relevancy, authenticity, or materiality of any of the information or documents to any issue in this case. To the extent a response herein identifies one or more individuals with knowledge concerning a particular subject matter identified in an Interrogatory, such response shall not be construed as an admission concerning the accuracy of Plaintiff's characterization of the subject matter. Apple expressly reserves the right to object to the use of these responses, the subject matter contained herein, or the documents produced in connection herewith during any subsequent proceeding, including the

Dated: June 5, 2025

/s/ Steven J. Wingard

Anna E. Dwyer
Garland T. Stephens
John P. Brinkmann
Melissa Hotze
Blue Peak Law Group, LLP
3139 Holcombe Blvd, Pmb 8160
Houston, TX 77025
772-631-6460
anna@bluepeak.law
garland@bluepeak.law
john@bluepeak.law
hotze@bluepeak.law

Steven J. Wingard
Robert Pierce Earle
Stephen Burbank
Scott Douglass & McConnico LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
(512) 495-6300
Fax: (512) 474-0731
swingard@scottdoug.com
rearle@scottdoug.com
sburbank@scottdoug.com

ATTORNEYS FOR DEFENDANT
APPLE INC.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record were served with a copy of the foregoing document
via electronic mail on June 5, 2025.

/s/ Steven J. Wingard

Steven J. Wingard