

August 12, 2025

Judge Jon S. Tigar
United States District Court, Northern District of California
Ronald V. Dellums Federal Building & United States Courthouse
Office of the Clerk
1301 Clay Street, Suite 400S
Oakland, CA 94612

Re: Samsung Elecs. Co., et al. v. CM HK Ltd., No. 4:24-cv-6567-JST (N.D. Cal.)

Dear Judge Tigar:

The parties jointly file this letter brief to resolve jurisdictional discovery issues.

I. Parties' Positions

A. Plaintiffs' Position

Plaintiffs seek the deposition of Chauncey Shey under Fed. R. Civ. P. 30(b)(1). Despite various correspondence between the parties, CM HK has refused to produce Mr. Shey as a witness, and the parties are now at an impasse. Plaintiffs also seek an order requiring Mr. Shey, Dr. Shun-Nan Liou (CM HK's sole director), and CM HK's 30(b)(6) witness(es) to testify by August 20, 2025 because Defendant has thus far not provided such dates for any of its deponents, despite an earlier agreement to conclude jurisdictional discovery by August 6, 2025.

On July 23, 2025, Samsung Electronics Co., Ltd. and Samsung Electronics America Inc. ("Samsung or Plaintiffs") served on CM HK Ltd. ("CM HK" or "Defendant") a notice of Rule 30(b)(1) deposition of Chauncey Shey. Ex. 1. CM HK's counsel responded that Mr. Shey is not affiliated with or controlled by CM HK, is not a party to this case, and is not represented by CM HK's counsel, and so they would not produce him for deposition. On July 25, 2025, the parties met and conferred by videoconference but were unable to resolve the dispute over Mr. Shey's deposition. Ex. 2 at 1.

The Ninth Circuit has found that if a person is a party, a simple notice of deposition is sufficient to compel attendance. *Jules Jordan Video, Inc. v. 144942 Canada Inc.*, 617 F.3d 1146, 1158 (9th Cir. 2010). In the context of a corporate party, a natural person is deemed a party for Rule 30(b)(1) notice purposes if that person is the party's officer, director, or managing agent. *Cadent Ltd. v. 3M Unitek Corp.*, 232 F.R.D. 625, 628 n.1 (C.D. Cal. 2005). The deponent is a managing agent of the corporate party if the deponent has control or authority over the corporate party's day-to-day business. *Nationstar Mortg., LLC v. Flamingo Trails No. 7 Landscape Maint. Ass'n*, 316 F.R.D. 327, 333 (D. Nev. 2016).

CM HK's refusal to provide Mr. Shey is contrary to law and contradicts its prior conduct and representations because Mr. Shey is a managing agent of CM HK that has control over CM HK's day-to-day operations. For example, CM HK has represented that "Mr. Shey was willing to act as a broker/messenger of any deal between CM HK, CyWee and Samsung," and CM HK's counsel represented to Samsung that "[p]er Mr. Shey, the CM HK Patents are available for purchase with a perpetual, paid-up license back to CM HK, Ltd." See Ex. 5 at 4. CM HK also represented that

“CyWee offers to carry \$25,000 of the costs until conclusion of the [CM HK] lawsuit” and that it can “get any response to [Mr. Shey] on Thursday.” Ex. 6.

CM HK has treated Mr. Shey as a party witness. CM HK’s Initial Disclosures identify Mr. Shey, direct Samsung to contact him “Through Counsel” (the same as the Initial Disclosures direct for contacting CM HK itself, CM HK’s corporate representative, and CM HK’s CEO Dr. Shun-Nan Liou), and state that Mr. Shey has “[k]nowledge including, but not limited to, CMHK’s formation, the rationale for investing in CMHK, CMHK’s operations and status, and the operational and going concern harm CMHK has suffered due to infringement of its patents.” EEx. 3 at 3-4.¹ Notably, CM HK identified **no other individual** knowledgeable about these topics. *See* Ex. 3 at 3-6. Jurisdictional discovery to date has uncovered that CM HK has no employees, no physical office space of its own, and a sole director, Dr. Liou. CM HK is 100% owned by CM Investment Inc., which also has no employees, no physical office space of its own, and Dr. Liou as its sole director. CM Investment Inc., in turn, is 100% owned by CyweeMotion Ltd., which also has no employees, no physical office space of its own, and Dr. Liou as its sole director. CyweeMotion Ltd., in turn, is 100% owned by CyweeMotion Group Ltd., which has five employees (including Dr. Liou) and seven board members (including Dr. Liou and Mr. Shey). All of CM HK, CM Investment Inc., CyweeMotion Ltd., and CyweeMotion Group Ltd. identify a single physical address for themselves. *See* Ex. 5 at 10-15. Meanwhile, CM HK has identified Mr. Shey as “Board member of CyWee Motion,” and then indicated that its corporate representative will be an “Agent or Member of CyWee Motion/CM HK LTD.” Ex. 3 at 3-4.² The distinction amongst these entities is thus illusory, even in CM HK’s own submissions. CM HK also cited and relied on a declaration from Mr. Shey in support of CM HK’s motion to dismiss. Dkt. 51-3.

CM HK’s present contention that CM HK is not affiliated with and cannot proffer Mr. Shey for deposition is thus unsupported by the law and contradicted by the record. It is also illustrative of the harm and injustice caused by the CyWee Entities’ alter ego and structure, because CM HK frequently blurs the lines between the entities but then leverages the corporate structure to attempt to withhold witnesses like Mr. Shey and documents. Samsung therefore asks the court to compel CM HK to produce Mr. Shey for deposition.

Relatedly, CM HK has not provided a date by which Dr. Liou and Mr. Shey are going to testify. During a meet and confer on June 17, 2025, the parties agreed to a jurisdictional discovery schedule that set July 23 as the last day to serve deposition notices and August 6 as the close of jurisdictional discovery. Exs. 7, 8, 9 (attachment to Ex. 8). Samsung served a 30(b)(6) notice on CM HK (Ex. 10) and 30(b)(1) notices for Dr. Liou (Ex. 11) and Mr. Shey (Ex. 1) in accordance with that schedule. Ex. 9. Given that Dr. Liou is the sole director of CM HK (Ex. 5 at 10-15) and Mr. Shey has extensive knowledge of CM HK. (Ex. 3 at 3-4), it should be no surprise that depositions for those individuals were noticed. CM HK has not provided available dates for Dr. Liou despite acknowledging that he will be deposed and its previous agreement to complete

¹ Lest CM HK try to explain this away by pointing to the fact that CyWee Group, Ltd. was still a party in this case when the Initial Disclosures were served, Samsung notes and emphasizes that CM HK also identified Mr. Shey—with the same direction to contact “Through Counsel” and the same statement of his relevant knowledge—in the co-pending case in the Eastern District of Texas where CM HK has always been the only plaintiff, *CM HK Ltd. v. Samsung Electronics Co., Ltd. et al.*, No. 2:24-cv-00880-JRG (E.D. Texas). Ex. 4 at 4.

² Mr. Shey is also identified as a director of CyWee Group Ltd., which has been an owner of CyweeMotion Group Ltd. since the latter’s inception. *See* Ex. 5 at 7, 10.

jurisdictional discovery by August 6. Ex. 12. CM HK also has not provided available dates for Mr. Shey, given its position that it will not proffer him for deposition.

The date by which Dr. Liou and Mr. Shey are going to testify will dictate when Samsung can file its amended complaint. Accordingly, Samsung asks the court to compel CM HK to provide dates on or before August 20, 2025 for the depositions of Dr. Liou, Mr. Shey, and CM HK's 30(b)(6) designating witness(es).

As Samsung previously discussed with CM HK during the meet and confer, Samsung intends and requests to take the deposition remotely via videoconference, during hours convenient for the witness. Any deposition will require at least a court reporter and an interpreter; it may be difficult to locate such personnel in Taiwan, requiring Samsung to fly those personnel to Taiwan, which will introduce delay. CM HK has identified no prejudice preventing the use of remote technology, so Samsung requests that the Court order that Samsung be allowed to depose witnesses in Taiwan using remote technology. In the alternative, Samsung requests that CM HK be ordered to bring its witnesses to the U.S. for deposition because those witnesses have traveled to the U.S. for previous depositions. For example, CM HK produced in this matter transcripts from depositions of Dr. Liou and Mr. Shey that were taken in Texas in the *CyWee Group Ltd. v. Apple Inc.* and *CyWee Group Ltd. v. Samsung Electronics Co., Ltd.* litigations.

B. CM HK's Position

1. Samsung has not Diligently Pursued Jurisdictional Discovery.

Samsung has not acted diligently in pursuing jurisdictional discovery. The Court authorized such discovery on May 15, 2025. Dkt. 73 at 20. And the parties agreed to complete it by August 6, 2025. Ex. 7 at 1; Ex. 9 at 1.³

Yet Samsung waited until June 9, 2025—nearly a month later—to serve written discovery consisting of 27 requests for production, 18 interrogatories, and 13 requests for admission. Ex. 14, 15, 16.

Then Samsung delayed until July 23, 2025 to serve its deposition notices—two weeks before the close of jurisdictional discovery. Exs. 1, 10, 11, 18. Samsung set these depositions unilaterally for July 30, July 31, August 1, and August 4. *Id.* Samsung knew as early as May 15 whom it wished to depose. There was no reason to wait.

CM HK is still trying to find a date in its CEO's schedule to schedule this deposition, which will need to be held in Taiwan utilizing a mandarin translator.

³ CM HK never agreed on a deadline to “serve deposition notices” because it was unnecessary. CM HK only ever proposed and agreed to dates for the close of jurisdictional discovery and for Samsung to file its amended complaint. Ex. 7 at 2 (CM HK proposing deadlines for close of jurisdictional discovery and to file an amended complaint).

2. Samsung Violated Civil L.R. 30-1 and this Court's Standing Order.

Under Civil L.R. 30-1, a party seeking to depose a party witness must confer with opposing counsel before noticing the deposition. Samsung failed to do so. It served its deposition notices unilaterally on July 23, then asked for availability after the fact. *See* Ex. 12 at 1 (“We served the deposition notices on July 23 and asked you for Dr. Liou’s availability thereafter...”).

Samsung’s deposition notices also violate Judge Tigar’s Standing Order, which requires all depositions be noticed “at least 30 days before the close of fact discovery.” Standing Order at 2. Samsung’s deposition notices came just 14 days before the agreed-upon close of jurisdictional fact discovery.

Accordingly, CM HK requests a protective order barring Samsung from taking any further jurisdictional discovery.

3. Chauncey Shey is a Third Party Whose Deposition Cannot be Noticed.

Samsung’s attempt to compel Mr. Chauncey Shey’s deposition under Rule 30(b)(1) is legally unfounded. Mr. Shey is not an officer, director, employee, or managing agent of CM HK. *See* Dkt. 52-3 at ¶ 2 (“I am the director of CyWee Group Ltd.”); Ex. 5 at 7:8-9 (“Mr. Shey has never held a position in any capacity at CM HK Ltd.”); *and* Ex. 12 at 2 (“Additionally, we do not represent Mr. Shey or Ms. Lin and neither of them are parties to this case.”). He is a director of CyWee Group Ltd.; a former party dismissed by Samsung on February 20, 2025. Dkt. 64. CM HK is governed by its CEO and sole director, Dr. Shun-Nan Liou. Ex. 5 at 11:10-12:8; Dkt. 51-1 at 2:8-9.

Rule 30(b)(1) applies only to parties and their officers, directors, or managing agents. *See Nationstar Mortg., LLC v. Flamingo Trails No. 7 Landscape Maint. Ass’n*, 316 F.R.D. 327, 333 (D. Nev. 2016). Mr. Shey is not an officer, director, or managing agent of CM HK. Ex. 5 at 7:8-11; Dkt. 64. To depose him, Samsung must proceed under Rule 45.

Samsung’s contrary arguments fall short. First, listing Mr. Shey in CM HK’s initial disclosures does not render him a managing agent. Rule 26(a) merely requires disclosure of individuals likely to have relevant information. And at the time those disclosures were made, CyWee Group was a party to this case. His role was identified as a board member of CyweeMotion Group Ltd.—the great-grandparent of CM HK. *Compare* Ex. 3 at 3:23-25; *and* Dkt. 61-3:1-14 (showing corporate structure).

Second, Samsung’s citation to Rule 408 settlement discussions does not establish control. At most, the communications reflect that Mr. Shey was willing to relay licensing positions between Samsung and CM HK. *See* Ex. 5 at 4:2-3 (“Mr. Shey was willing to act as a broker/messenger of any deal between CM HK, CyWee and Samsung, but no deal ever emerged.”) That does not make him an officer, employee, or managing agent of CM HK. Samsung offers no evidentiary support for its claim that Mr. Shey “has control over CM HK’s day-to-day operations,” which is inconsistent with all the evidence in the record.

Third, Samsung misstates the purpose of Mr. Shey’s prior declaration. That declaration was submitted by CyWee Group—not CM HK—in support of its own motion to dismiss. *See* Dkt. 52-3. CM HK’s citation to that declaration does not transform Mr. Shey into a managing director of CM HK.

Finally, Samsung's argument that CM HK and related entities are "illusory" repeats its alter ego theory. But this Court has already held that Samsung's allegations "that CM HK and CyWee [] have 'some of the same employees, directors, officer, and ownership' is insufficient to show the level of pervasive control required" to prove alter ego. Dkt. 73 at 17:22–27. Samsung merely makes the same, inadequate allegations here.

In short, Mr. Shey is a third party, and Samsung must proceed by subpoena if it wishes to depose him. However, the deadline for jurisdictional discovery has passed. Samsung violated this Court's Civil L.R. and Standing Order for noticing depositions. Samsung should be barred from pursuing further jurisdictional discovery depositions

II. Parties' Views on Whether a Hearing is Needed

Samsung does not believe a hearing is needed to resolve this issue but would welcome one should the Court have any questions.

CM HK believes a hearing is needed to resolve this issue and clarify the scope of jurisdictional discovery and Samsung's alter ego theory.

III. Discovery Cut-off Dates for Jurisdictional Discovery

The parties agreed to a jurisdictional discovery cut-off date of August 6, 2025, although the Court has not officially entered a schedule.

IV. Statement of Compliance Regarding Meet-and-Confer

On July 25, 2025, the parties met and conferred by videoconference for approximately 75 minutes regarding jurisdictional discovery issues, including the issues raised in this dispute letter. Raymond Stockstill and Sasha Vujcic participated for Samsung. Chris Evans and Zachary Della Porta participated for CM HK, with Michael Shore joining for CM HK for approximately the last five to ten minutes of the videoconference.

V. Specific Discovery Material at Issue

Exhibit No.	Subject Matter
Ex. 1	2025-07-23 Samsung's Jurisdiction-Related Rule 30(b)(1) Deposition Notice to Chauncey Shey
Ex. 10	2025-07-23 Samsung's Jurisdiction-Related Rule 30(b)(6) Deposition Notice to CM HK
Ex. 11	2025-07-23 Samsung's Jurisdiction-Related Rule 30(b)(1) Deposition Notice to Liou

PAUL HASTINGS LLP

/s/ Elizabeth L. Brann

Elizabeth L. Brann

OFFOR EVANS PLLC

/s/ Christopher L. Evans

Christopher L. Evans

Exhibit 1

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[ADDITIONAL COUNSEL LISTED
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Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD.,

Defendant.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' NOTICE OF RULE
30(b)(1) DEPOSITION REGARDING
JURISDICTION TO CHAUNCEY SHEY**

DEMAND FOR JURY TRIAL

1 Pursuant to Rule 30(b)(1), PLEASE TAKE NOTICE that, beginning at 9:30 a.m. PDT on
2 July 31, 2025, Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
3 (collectively, “Defendants”), by their undersigned attorneys, will take the remote oral and
4 videotaped deposition of Chauncey Shey.

5 The deposition will be reported by a duly authorized court reporter and certified
6 videographer. The deposition will be conducted before an officer authorized to administer oaths
7 and will continue from day-to-day, weekends and legal holidays excluded, until completed, or
8 according to a Court-ordered schedule. The deposition will be taken for the purpose of discovery,
9 for use at trial or any hearing in this matter, and for any other purpose permitted by the Federal
10 Rules of Civil Procedure.

1 DATED: July 23, 2025

Respectfully submitted,

2 By: /s/ Elizabeth L. Brann

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21 Attorneys for Plaintiffs

22 Samsung Electronics Co., Ltd. and Samsung

23 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On July 23, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 23, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 2

PAUL HASTINGS

1(858) 458-3002
sashavujcic@paulhastings.com

July 25, 2025

VIA EMAIL

Christopher Evans
Offor Evans PLLC
chris@offorevans.com

Re: *Samsung Elecs. Co., et al. v. CM HK Ltd.*, No. 4:24-cv-6567-JST (N.D. Cal.)
Meet and Confer Request Regarding CM HK's Jurisdictional Discovery Response Deficiencies

Dear Chris:

We write to memorialize our meet and confer on July 25, 2025. The following was discussed:

Chauncey Shey Deposition: Samsung asked whether CM HK would produce Chauncey Shey as a 30(b)(1) witness. We explained that in its initial disclosures in this case (and in the Texas case), CM HK identified him as knowledgeable regarding various items for CM HK and indicated to contact him "through counsel", and that CM HK cited and relied on his declaration in support of CM HK's motion to dismiss. CM HK's position is that you do not represent Mr. Shey, he is not a party, he is not an employee of CM HK but rather its parent entity, and CM HK will not present him for deposition. The parties are at an impasse.

Tiffany Lin Deposition: Samsung asked whether CM HK would produce Tiffany Lin a 30(b)(1) witness. CM HK said it would not, taking the position that you do not represent Ms. Lin, she is not a party, she is not an employee of CM HK but rather its parent entity, and CM HK will not present her for deposition. The parties are at an impasse.

Deposition Topics: We discussed relevance on certain topics and CM HK indicated its responses will be forthcoming.

Documents you have referred to as CM HK's "own" documents

- **Financial Records (Request for Production Nos. 15, 16):** CM HK agreed to produce, for the requested period, annual financial reports including financial statements and balance sheets.
- **Formation Documents (Request for Production No. 15):** CM HK claims that they have already produced the formation documents and that they may be in Mandarin. Upon Samsung's request, CM HK agreed that they will provide the bates numbers identifying those documents.
- **Fund Transfer Documents (Request for Production No. 17):** CM HK stated that the information regarding transfers of funds between CM HK and another CyWee Entity would be in the bank statements. CM HK agreed to produce the bank statements for 2016 (or earliest available) and 2024. Samsung maintains the scope of its request. The parties are at an impasse as to evidence of other transfers beyond what may be reflected in the bank statements CM HK has agreed to produce.

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- **Bank documents (Request for Production No. 19):** CM HK agreed to produce the bank statements for 2016 and 2024. Samsung maintains that to the extent ownership of CM HK's bank account(s) changed at any point since inception, documents sufficient to show that change should be produced. To the extent that such a change in ownership occurred and documents sufficient to evidence that are being withheld, the parties are at an impasse.
- **Meeting Documents (Request for Production No. 22):** CM HK agreed to produce board meeting minutes for the requested period.

Documents with respect to other entities: Samsung explained that materials relating to the other entities are relevant. The unity of interest between CM HK and CyWee Group is evidenced by and also runs through the other intermediary companies; the existence of intermediary companies does not diminish the unity of interest nor render information about those intermediary entities irrelevant or non-discoverable. For example, if CyWee Group Ltd. is commingling funds with CM HK via CyweeMotion Group Ltd., that is relevant to showing alter ego notwithstanding the use of the intermediary entity; CM HK's position impedes discovery into this relationship. CM HK, CM Investment Inc., and Cywee Motion Ltd. each have 0 employees and share a physical office with CyweeMotion Group Ltd. (with whom they also share a common officer in Dr. Liou), which is owned by CyWee Group Ltd. Samsung has alleged CM HK and the other entities are manipulating assets among one another and exploiting this structure to, *inter alia*, dodge jurisdiction (enabling them to threaten infringement actions while attempting to evade declaratory judgment jurisdiction in venues they do not prefer) and withhold and conceal documents and information. Samsung seeks information relevant to this theory and maintains that the claim CM HK (which shares an office with the other entities and whose sole director and officer, Dr. Liou, is also officer and director in control of those entities) does not have the documents in its possession, custody, and control is unsupported and an example of the sort of injustice and harm that the alter ego is causing. Samsung also pointed out that CM HK already has produced some materials from the other entities. CM HK states that they will not produce requested documents with respect to entities other than CM HK because CM HK is not in possession, custody, or control of those documents. The parties are at an impasse.

Privilege Log: CM HK stated that the documents being withheld based on privilege are documents between Chauncey Shey and counsel Michael Shore relating to CyWee Group, and documents about this litigation. CM HK stated that there are no other documents being withheld based on privilege. CM HK stated that they will not be providing a privilege log.

Interrogatories with respect to CM HK (not other entities):

- **Interrogatory Nos. 1, 3-6:** CM HK states that it will not be supplementing because no documents exist and CM HK has no knowledge since these were statements made by CyWee Group's lawyer (counsel Michael Shore, who is also CM HK's lawyer) on behalf of CyWee Group.
- **Interrogatory No. 9:** Samsung agreed that if the annual financial reports are provided in response to RFPs 15 and 16 (see above), this request is satisfied as to CM HK only.
- **Interrogatory No. 11:** CM HK stated that they are not aware of anybody other than CM Investment Inc. exercising any control over, provided capital to or for, donated or provided gifts to, or otherwise transferred money to CM HK in the requested period.

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- **Interrogatory No. 12:** CM HK stated that they provided the information for the whole period already. CM HK represented that Dr. Liou has been the sole director of CM HK and CM Investment Inc. has been the owner of CM HK for the entirety of CM HK's existence.
- **Interrogatory No. 13:** As discussed above as to RFP No. 19, CM HK agreed to produce the bank statements for 2016 and 2024 as to CM HK only. Samsung maintains the scope of its request, *i.e.*, as to the other CyWee Entities. The parties are at an impasse as to the other CyWee Entities.
- **Interrogatory No. 14:** CM HK stated that it is not aware of any founder for CM HK, and that the registered agent should be listed in the formation documents.
- **Interrogatory No. 15:** As discussed above with respect to RFP No. 22, CM HK agreed to produce board meeting minutes for the requested period; Samsung acknowledged that production likely satisfies this interrogatory as to CM HK only.
- **Interrogatory No. 16:** CM HK stated that they are not aware of any employees, independent contractors, consultants, freelance worker, or agents, in any of the Cywee Motion entities (*i.e.*, CyweeMotion Group. Ltd., Cywee Motion Ltd., Cywee Motion Inc., CyweeMotion HK Ltd., CM Investment Inc, and CM HK.) other than the five employees listed in the original response.
- **Interrogatory No. 17:** CM HK stated that it will provide an answer as to the operations conducted at the CyWee Entities' physical location.
- **Interrogatory No. 18:** As discussed above with respect to RFP Nos. 15 and 16, CM HK agreed to produce CM HK's annual financial reports including financial statements and balance sheets, for the requested period. Samsung acknowledged that production likely satisfies this interrogatory as to CM HK.

CM HK's jurisdictional discovery requests: CM HK's position is that it is entitled to jurisdictional discovery as to Samsung's jurisdictional theory. Samsung disagrees. Jurisdictional discovery is waived if not requested. Samsung requested jurisdictional discovery regarding the connections between CM HK and CyWee Group Ltd. The Court granted that request. *See* Dkt. 73 at 19 ("Samsung contends that jurisdictional discovery 'would reveal the extent of the connection between CM HK and CyWee.' The Court agrees." (internal citation omitted)). CM HK did not request jurisdictional discovery. Nor would jurisdictional discovery by CM HK from Samsung make sense here, as the jurisdictional issue turns on CM HK's unity of interest with CyWee Group Ltd. We emphasized that, indeed, communications by CM HK's counsel make clear that the discovery requests were served for a purpose unrelated to jurisdictional discovery. We also stated that a motion to compel by CM HK would be unfounded and improper in light of the foregoing. Notwithstanding the foregoing, and while reserving all rights, we are continuing to evaluate your position.

Interrogatories with respect to other entities: CM HK states that they will not respond to the requested documents with respect to entities other than CM HK because CM HK is not in possession, custody, or control of that information. The parties are at an impasse.

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CM HK's next production: CM HK states that they will provide Samsung an estimate of when CM HK can produce the documents they have represented that they will be producing. These documents should have been produced weeks ago under the party's agreement on a schedule for jurisdictional discovery; Samsung expects them to be produced immediately to avoid any further prejudice.

Liou Deposition: CM HK agrees to produce Dr. Liou as a 30(b)(1) and indicated he will likely be its 30(b)(6) witness. CM HK states that they will provide dates of availability for Dr. Liou's deposition.

With regard to items as to which we are at an impasse, we are evaluating whether to move to compel and on what items. If we proceed with a motion to compel, we will follow the applicable procedure and send you our portion of a joint letter.

Sincerely,

/s/ Sasha Vujcic

Sasha Vujcic
for PAUL HASTINGS LLP

Exhibit 3

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ATTORNEYS FOR DEFENDANTS
CM HK, LTD. and CyWee Group LTD.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS AMERICA,
INC.,

Plaintiffs,

vs.

CM HK, LTD., AND CYWEE GROUP LTD.,

Defendants.

CASE NO. 4:24-cv-06567-JST

**DEFENDANT CM HK LTD.'s INITIAL
DISCLOSURES PURSUANT TO
RULE 26(a)(1)**

JURY TRIAL DEMANDED

1 Pursuant to Fed. R. Civ. Pro 26(a)(1), Defendant, CM HK Ltd. (“CMHK”) hereby provides
2 its initial disclosures to Plaintiffs, Samsung Electronics CO. Ltd., and Samsung Electronics America
3 Inc.

4 CMHK asserts that venue is improper in the Northern District of California. CMHK asserts
5 that the Northern District of California Court lacks subject matter jurisdiction. CMHK asserts that
6 the Northern District of California Court does not have personal jurisdiction. By serving these
7 initial disclosures, CMHK does not waive its objections to jurisdiction or venue. CMHK has filed
8 suit for infringement of the asserted claims in the Eastern District of Texas, the venue in which the
9 prior suit between parties was proper. The case is styled *CM HK Limited v. Samsung Electronics*
10 *Co., et al.*, 2:24-cv-00880-JRG (E.D. Tex.). Samsung infringes claims 1, 2, 7, and 8 of U.S. Patent
11 No. 10,852,846 (the “’846 patent”) and claims 1, 2, 3, 9, 14, 15, 16, and 22 of U.S. Patent No.
12 11,698,687 (the “’687 patent”). Samsung is not entitled to a ruling of non-infringement. CMHK
13 reserves all defenses, at law or equity, which may now exist or in the future be available based on
14 discovery and further factual investigation in this case.
15
16

17 CMHK makes these disclosures based on its current knowledge following a reasonable and
18 diligent investigation and without waiver of attorney-client privilege, work product, or common
19 interest privilege. By making these disclosures, CMHK is not waiving any right to object on any
20 basis to the use of such information in this case or any other case. CMHK expressly reserves the
21 right to amend or modify these disclosures based on additional information obtained through
22 discovery or other means under FED. R. CIV. P. 26(e).
23
24
25
26

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), and subject to the foregoing and any future reservations and objections, Defendants identify the following individuals, on whom it may rely on to support its claims and defenses and who are likely to have discoverable information relating to the issues in this action.

Name	Contact Info	Connection to Case	Summary of Information
CM HK, Ltd.	Through Counsel	Defendant	CMHK's licensing practices and patent assignments.
Zhou Ye	Through Counsel	Inventor	Inventor of the '846 and '687 patents
Chin-Lung Li	8F, No. 9 Jinshan 10th St. East Dist. Hsinchu City 300, Taiwan Telephone: +886 963 230507	Inventor	Inventor of the '846 and '687 patents
Shun-Nan Liou	Through Counsel	Inventor	Inventor of the '846 and '687 patents
Belinda Lee	c/o Jiang Chyun Intellectual Property Office 7F-1, 100, Roosevelt Rd., Sec. 2, Taipei, Taiwan	Prosecuting Agent	Prosecuting Agent of the '438 and '978 Patents
Ding Yu Tan	c/o Foresight IP 14F., No. 111, Songjiang Rd Unit B03, Taipei, Taiwan	Patent Agent	Patent agent for the '438 and '978 patents.
Michael P. Qualey	McClure, Qualey & Rodack, LLP 280 Interstate North Circle Se, Suite 550 Atlanta, Georgia 30339	Patent Agent	Patent agent for '846 and '687 patents.
Chauncey Shey	Through Counsel	Board member of CyWee Motion	Knowledge including, but not limited to, CMHK's formation, the rationale for investing in CMHK, CMHK's operations and status, and the

			operational and going concern harm CMHK has suffered due to infringement of its patents.
CM HK, Ltd. corporate representative TBD	Through Counsel	Agent or Member of CyWee Motion/ CM HK LTD.	Knowledge of, but not limited to, CyWee and CMHK's practices and documentation for sale, retention, license, use and transfer of the Asserted Patents.
Mike Popesku	Through Counsel Head of Research at Cambridge Analytica London, UK	CyWee Expert	Expert Retained in the <i>CyWee case</i> by the Plaintiff
Thomas Richardson	Through Counsel 257 Brixton Road, Stockwell, London, UK +447373392696	CyWee Expert	Expert Retained in the <i>CyWee case</i> by the Plaintiff
Ching Chun Wu	Rm. 260, Bldg. 77, 195, Sec. 4 Chung Hsmg Rd. Chutung, Hsinchu 31040, Taiwan, R.O.C. Tel: +866 3 5916827	Employee of the Industrial Technology Research Institute of Taiwan ("ITRI")	Knowledge regarding ITRI and the circumstances surrounding CyWee's inception, formation, and spin-out from ITRI
Scott Steinberg	Through Counsel	CyWee Expert	Expert Retained in the <i>CyWee case</i> by the Plaintiff
Eric R. Bachmann	Through Counsel Miami University McVey Data Science Building, Room 386 105 Tallawanda Road, Oxford, Oh 45056-1601	Expert Witness	Knowledge including, but not limited to, Infringement, Prior Art, and Patent Specifications
Joseph LaViola	Through Counsel	Expert Witness	Knowledge including, but not limited to, Infringement, Prior

	JJL Interface Consultants, Inc. 760 Red Haven Lane Oviedo, FL 32765 Phone: 401-359-0561		Art, and Patent Specifications, Deposed in The <i>CyWee Case</i>
Gongbo Moon	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
OHeon Kwon	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
ChanHyoung Park	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
Sujeong Heo	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
Seongsig Kang	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
Guy Waitley	Through Counsel	Samsung Electronics America Inc.	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
Sean Diaz	Through Counsel	Samsung Electronics America Inc.	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>
Dohyoung Chung	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, Deposed in The <i>CyWee Case</i>

Jong Pil Hong	Through Counsel	Samsung Electronics Corporation	Corporate Representative deposited in The <i>CyWee Case</i>
Dangwon Kim	Through Counsel	Samsung Electronics Corporation	Corporate Representative deposited in The <i>CyWee Case</i>
Lee Injung	Through Counsel	Samsung Electronics Corporation	Samsung licensing and Intellectual Property practices, deposited in The <i>CyWee Case</i>
Kaushik Sridharan Lnu	Through Counsel	QualComm	Third-party to Samsung Electronics with knowledge of Sensor Fusion Hub and sensing algorithms used by Qualcomm enabled Samsung Products
Melvin Ray Mercer	Department of Electrical and Computer - Engineering TexasA&M University 10801 Branch Oaks Circle, Dallas Tx 75230 Phone: (979) 676-3109	Samsung Electronics Corporation	Retained expert of Samsung Electronics Co., in the <i>CyWee Case</i>
Namjoon Park	Through Counsel	Samsung Electronics Corporation	Knowledgeable about Samsung sensor fusion Algorithm, deposited in The <i>CyWee Case</i>
Majid Sarrafzadeh	Computer Science Department UCLA 3532C Boelter Hall Los Angeles, CA 90095 Phone: (310) 794-4303	Expert to IPR 2019-00534, 2018-01257 and 2018-01258	Expert retained by Petitioners Google et. al. during IPRs over Patent nos. '978 and '438.

CMHK also incorporates by reference the Rule 26 disclosures (all parties), deposition transcripts (all witnesses), interrogatory responses (all parties) and all individuals identified therein from the case styled *CyWee Group Ltd., v Samsung Electronics Co et. al.*, 2:17-cv-

00140-RWS-RSP, (E. D. Tex. Filed Feb 2. 2017)¹, as well as all persons with knowledge identified in Samsung's initial disclosures in this action.

II. DOCUMENTS AND TANGIBLE THINGS.

CMHK will produce the following materials:

1. Pleadings for IPR 2018-01257 and 2018-01258
2. Pleadings and depositions from IPR *Google LLC, ZTE (Usa), Inc., Samsung Electronics Co., Ltd., LG Electronics Inc., Huawei Device USA, Inc., Huawei Device Co. Ltd., Huawei Technologies Co. Ltd., Huawei Device (Dongguan) Co. Ltd., Huawei Investment & Holding Co. Ltd., Huawei Tech. Investment Co. Ltd., Huawei Device (Hong Kong) Co. Ltd. v. CyWee Group Ltd.*, IPR2018-01257 ("The 8,552,978 IPR").
3. Pleadings and depositions from IPR *GOOGLE LLC, et al. v. CyWee Group Ltd.*, IPR2018-01258 ("The 8,441,438 IPR").
4. Litigation pleadings in connection to the *CyWee Case*
5. Answers to written discovery in the *CyWee Case*;
6. Claim construction briefing in the *CyWee Case*; and
7. Expert reports submitted by all parties in the *CyWee Case*.

Further, CMHK will produce all documents, electronically stored information, and tangible things in its possession, custody, or control that are relevant to the pleaded claims or defenses involved in this action. CMHK does not waive its right to object to the production of any documents, electronically stored information, or tangible things on any appropriate ground, including attorney-client privilege or work product.

¹ *CyWee Group Ltd., v Samsung Electronics Co et. al.*, 2:17-cv-00140-RWS-RSP, (E. D. Tex.) ("The CyWee Case").

III. DAMAGES

CMHK denies that Plaintiffs are entitled to the relief sought. Plaintiffs have not asserted a claim upon which monetary relief may be sought. CMHK defers its disclosure of damages until the deadline for Expert Disclosures. By making this disclosure, CMHK does not waive its right to object to the production of any documents or other evidentiary materials on any appropriate ground, including attorney-client privilege or work product.

IV. INSURANCE

CMHK is not aware of any indemnity or insurance agreements that fall within the scope of Rule 26(a)(1)(A)(iv) but reserves the right to supplement this disclosure if additional information becomes available.

DATED: December 26, 2024

/s/ Michael W. Shore
Michael W. Shore

Attorneys for Defendants
CM HK Ltd., and CyWee Group Ltd.

CERTIFICATE OF SERVICE

I, certify that, on December 26, 2024, a true and correct copy of *CM HK, Ltd.'s Initial Disclosures* was served, via email, upon the following counsel of record for Plaintiffs:

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Ariell N. Bratton
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Attorneys for Plaintiffs
Samsung Electronics Co. Ltd., and
Samsung Electronics America, Inc.

/s/ Jennifer Johnson _____
Jennifer Johnson

Exhibit 4

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

CM HK LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

CASE NO. 2:24-cv-00880-JRG

JURY TRIAL DEMANDED

PLAINTIFF CM HK LIMITED’S INITIAL AND ADDITIONAL DISCLOSURES

Pursuant to the Pre-Case Management Conference Court Order (Dkt. 13), Plaintiff, CM HK Ltd. (“CMHK”) makes the following initial disclosures.

I. PRELIMINARY STATEMENT AND OBJECTIONS

CMHK makes these disclosures based on its current knowledge following a reasonable and diligent investigation and without waiver of attorney-client privilege, work-product or common interest privilege. By making these disclosures, CMHK is not waiving any right to object on any basis to the use of such information in this case or any other case. CMHK expressly reserves the right to amend or modify these disclosures based on additional information obtained through discovery or other means under FED. R. CIV. P. 26(e). By making the following initial disclosures, Plaintiff does not waive, and hereby expressly reserves, its right to assert any and all objections.

II. INITIAL DISCLOSURES

A. The correct names of the parties to the lawsuit.

Plaintiff: CM HK Limited.

Defendants: Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

(collectively “Samsung”).

B. The name, address, and telephone number of any potential parties.

CMHK is not aware of any potential parties at this time.

C. The legal theories and, in general, the factual bases of the disclosing party’s claims or defenses.

CMHK alleges that each of the following products infringes claims 1, 3, 7, and 9 of U.S. Patent No. 10,852,846 (the “846 patent”) as described in CMHK’s P.R. 3-1 Disclosures: Samsung phones, tablets, Virtual Reality applications and devices, and laptops, which run a version of the Android operating system with either a SoC (System-on-Chip) or separate processor that includes a 3-axis accelerometer, 3-axis gyroscope, and 3-axis magnetometer and/or a combination of any of the previous elements (such as a 6-axis or 9-axis sensor module) such that the device is operable to detect 3-axis acceleration, 3-axis rotation, and 3-axis magnetism, released in the United States concurrently with or after the release of the devices in the following chart.

CMHK alleges that each of the following products infringes claims 1, 2, 3, 4, 5, 6, 7, 12, 14, and 25 of U.S. Patent No. 11,698,687 (the “687 patent”) as described in CMHK’s P.R. 3-1 disclosures: Samsung phones, tablets, Virtual Reality applications and devices, and laptops, which run a version of the Android operating system with either a SoC (System-on-Chip) or separate processor that includes a 3-axis accelerometer, 3-axis gyroscope, and 3-axis magnetometer and/or a combination of any of the previous elements (such as a 6-axis or 9-axis sensor module) such that

the device is operable to detect 3-axis acceleration, 3-axis rotation, and 3-axis magnetism, released in the United States concurrently with or after the release of the devices in the following chart.

<u>NAME</u>	<u>US RELEASE DATE</u>	<u>CHIPSET</u>
GALAXY S21	1/29/21	QUALCOMM SNAPDRAGON 888
GALAXY S21+	1/29/21	QUALCOMM SNAPDRAGON 888
GALAXY S21 ULTRA	1/29/21	QUALCOMM SNAPDRAGON 888
GALAXY Z FLIP3	8/27/21	QUALCOMM SNAPDRAGON 888
GALAXY Z FOLD3	8/27/21	QUALCOMM SNAPDRAGON 888
GALAXY S21 FE	1/11/22	QUALCOMM SNAPDRAGON 888
GALAXY S22	2/25/22	QUALCOMM SNAPDRAGON 8 GEN 1
GALAXY S22+	2/25/22	QUALCOMM SNAPDRAGON 8 GEN 1
GALAXY S22 ULTRA	2/25/22	QUALCOMM SNAPDRAGON 8 GEN 1
GALAXY Z FLIP4	8/26/22	QUALCOMM SNAPDRAGON 8+ GEN 1
GALAXY Z FOLD4	8/26/22	QUALCOMM SNAPDRAGON 8+ GEN 1
GALAXY S23	2/17/23	SNAPDRAGON 8 GEN 2 FOR GALAXY
GALAXY S23+	2/17/23	SNAPDRAGON 8 GEN 2 FOR GALAXY
GALAXY S23 ULTRA	2/17/23	SNAPDRAGON 8 GEN 2 FOR GALAXY
GALAXY Z FLIP5	8/11/23	SNAPDRAGON 8 GEN 2 FOR GALAXY
GALAXY Z FOLD5	8/11/23	SNAPDRAGON 8 GEN 2 FOR GALAXY
GALAXY S24	1/31/24	SNAPDRAGON 8 GEN 3 FOR GALAXY
GALAXY S24+	1/31/24	SNAPDRAGON 8 GEN 3 FOR GALAXY
GALAXY S24 ULTRA	1/31/24	SNAPDRAGON 8 GEN 3 FOR GALAXY
GALAXY Z FLIP6	7/24/24	SNAPDRAGON 8 GEN 3 FOR GALAXY
GALAXY Z FOLD6	7/24/24	SNAPDRAGON 8 GEN 3 FOR GALAXY

Further, CMHK contends that Samsung's infringement of the asserted patents has been willful; thus, entitling CMHK to enhanced damages under 35 U.S.C. § 284. CMHK reserves the right to amend this list of accused products and devices as discovery is conducted.

D. The names, addresses, and telephone numbers of persons having knowledge of relevant facts, a brief statement of each identified person's connection with the case, and a brief, fair summary of the information known by any such person.

Name	Contact Info	Connection to Case	Summary of Information
CM HK, Ltd.	Through Counsel	Plaintiff	CMHK's licensing practices and patent assignments.
Zhou Ye	Through Counsel	Inventor	Inventor of the '846 and '687 patents.
Chin-Lung Li	8F, No. 9 Jinshan 10th St. East Dist. Hsinchu City 300, Taiwan Telephone: +886 963 230507	Inventor	Inventor of the '846 and '687 patents.
Shun-Nan Liou	Through Counsel	Inventor	Inventor of the '846 and '687 patents.
Chauncey Shey	Through Counsel	Board member of CyWee Motion	Knowledge including, but not limited to, CMHK's formation, the rationale for investing in CMHK, CMHK's operations and status, and the operational and ongoing harm CMHK has suffered due to the infringement of its patents.
CM HK, Ltd's corporate representative TBD	Through Counsel	Agent or Member of CyWee Motion/ CM HK Ltd	Knowledge of, but not limited to, CyWee and CMHK's practices and documentation for sale, retention, license, use and transfer of the Asserted Patents.
Ching Chun Wu	Rm. 260, Bldg. 77, 195, Sec. 4 Chung Hsmg Rd. Chutung, Hsinchu 31040, Taiwan, R.O.C. Tel: +866 3 5916827	Employee of Industrial Technology Research Institute of Taiwan ("ITRI")	Knowledge regarding ITRI and the circumstances surrounding CyWee's inception, formation, and spin-out from ITRI.
Gongbo Moon	Through Counsel	Samsung Electronics	Knowledge about Samsung sensor

		Corporation	fusion Algorithm, deposited in The <i>CyWee</i> case
OHeon Kwon	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
ChanHyoung Park	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Sujeong Heo	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Seongsig Kang	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Guy Waitley	Through Counsel	Samsung Electronics America Inc.	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Sean Diaz	Through Counsel	Samsung Electronics America Inc.	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Dohyoung Chung	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion Algorithm, deposited in The <i>CyWee</i> case.
Jong Pil Hong	Through Counsel	Samsung Electronics Corporation	Corporate Representative deposited in the <i>CyWee</i> case.
Dangwon Kim	Through Counsel	Samsung Electronics Corporation	Corporate Representative deposited in the <i>CyWee</i> case.
Lee Injung	Through Counsel	Samsung Electronics Corporation	Samsung licensing and Intellectual Property practices, deposited in the <i>CyWee</i> case.
Jinik Kim	Through Counsel	Samsung Electronics	Knowledge regarding Samsung sensor

		Corporation	fusion algorithm.
Kaushik Sridharan Lnu	Through Counsel	QualComm	Third-party to Samsung Electronics with knowledge of Sensor Fusion Hub and Sensing Algorithms used by Qualcomm-enabled Samsung Products.
Namjoon Park	Through Counsel	Samsung Electronics Corporation	Knowledge regarding Samsung sensor fusion algorithms, deposited in the <i>CyWee</i> case.

CMHK also incorporates by reference the individuals identified in Samsung's initial disclosures. CMHK also incorporates by reference the Rule 26 disclosures (all parties), deposition transcripts (all witnesses), interrogatory responses (all parties) and all individuals identified therein from the case styled *CyWee Group Ltd., v Samsung Electronics Co et. al.*, 2:17-cv-00140-RWS-RSP, (E. D. Tex. Filed Feb 2. 2017)¹, as well as all persons with knowledge identified in Samsung's initial disclosures in this action.

E. Any indemnity and insurance agreements under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

CMHK is not aware of any indemnity or insurance agreements.

F. Any settlement agreements relevant to the subject matter of this action.

The case styled as *CyWee Group Ltd. v. Apple Inc.*, Case No. 3:14-cv01853-HSG (N.D. Cal.) resulted in a settlement agreement and dismissal of said case.

¹ *CyWee Group Ltd., v Samsung Electronics Co et. al.*, 2:17-cv-00140-RWS-RSP, (E. D. Tex.) (the "*CyWee* case").

G. Any statement of any party to the litigation.

CMHK states that prior statements by CM HK, CyWee Motion Group Ltd., or CyWee Group Ltd., may be relevant to this action and were made in connection with any of the following proceedings identified below:

CyWee Group Ltd., v. Samsung Electronics Co et. al., 2:17-cv-00140-RWS-RSP, (E. D. Tex.); *CyWee Group Ltd., v. Apple Inc.*, 3:14-cv-01853-JSC (N.D. Cal.); *CyWee Group Ltd., v. Google Inc.*, 1:18-cv-00571-UNA (D. Del.); *CyWee Group Ltd., v. HTC Corporation et al.*, 2:17-cv-00932 (W.D. Wash.); *CyWee Group Ltd., v. Huawei Technologies Co., Ltd., et al.*, 2:17-cv-00495 (E.D. Tex.); *CyWee Group Ltd., v. LG Electronics, Inc. et al.*, 3:17-cv-01102-GPC-RBB (S.D. Cal.); *CyWee Group Ltd., v. Motorola Mobility Inc.*, 1:17-cv-00780-UNA (D. Del.).

CMHK has produced the following materials:

1. Pleadings for IPR 2018-01257 and 2018-01258
2. Pleadings and depositions from IPR *Google LLC, ZTE (Usa), Inc., Samsung Electronics Co., Ltd., LG Electronics Inc., Huawei Device USA, Inc., Huawei Device Co. Ltd., Huawei Technologies Co. Ltd., Huawei Device (Dongguan) Co. Ltd., Huawei Investment & Holding Co. Ltd., Huawei Tech. Investment Co. Ltd., Huawei Device (Hong Kong) Co. Ltd. v. CyWee Group Ltd.*, IPR2018-01257 (“The 8,552,978 IPR”).
3. Pleadings and depositions from IPR *GOOGLE LLC, et al. v. CyWee Group Ltd.*, IPR2018-01258 (“The 8,441,438 IPR”).
4. Litigation pleadings in connection to the *CyWee* case.
5. Answers to written discovery in the *CyWee* case.
6. Claim construction briefing in the *CyWee* case, and
7. Expert reports submitted by all parties in the *CyWee* case.

III. ADDITIONAL DISCLOSURES

- A. Produce or permit the inspection of all documents, electronically stored information, and tangible things in the possession, custody, or control of the party that are relevant to the pleaded claims or defenses involved in this action.**

CMHK will produce all documents, electronically stored information, and tangible things in its possession, custody, or control that are relevant to the pleaded claims or defenses involved in this action. CMHK does not waive its right to object to the production of any documents, electronically stored information, or tangible things on any appropriate ground, including attorney-client privilege or work product.

- B. Provide a computation of any category of damages claimed by any party to the action.**

CMHK defers its disclosure of the computation of damages until the deadline for expert disclosures because it will rely on a damages expert. CMHK will produce documents or other evidentiary materials in its possession, custody, or control on which such computation is based. By making this disclosure, CMHK does not waive its right to object to the production of any documents or other evidentiary materials on any appropriate ground, including attorney-client privilege or work-product.

DATED: February 11, 2025

/s/ Zachary R. Della Porta

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ATTORNEYS FOR PLAINTIFF CM HK, LTD.

CERTIFICATE OF SERVICE

The undersigned certifies that on February 11, 2025, a true and correct copy of CM HK, Ltd.'s Initial Disclosures was served, via email, upon the following counsel of record for Defendants:

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/s/ Zachary R. Della Porta
Zachary Della Porta

Exhibit 5

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Attorneys for Defendants
CM HK, Limited.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SAMSUNG ELECTRONICS CO. LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

v.

CM HK, LIMITED

Defendant.

Case No. 4:24-CV-06567-JST

**DEFENDANT CM HK, LTD.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF
JURISDICTIONAL
INTERROGATORIES TO
DEFENDANT CM HK, LTD
(NOS. 1-18)**

DEMAND FOR JURY TRIAL

CASE NO. 4:24-CV-06567-JST

CM HK'S Objections and Responses to
Plaintiffs' First Set of Jurisdictional Interrogatories

TO: Plaintiffs Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., by and through their attorneys of record, Elizabeth Brann, Ariell Bratton and Sasha Vujcic:

Defendant CM HK, Ltd. (“CM HK”) hereby serves the following Objections and Responses to Plaintiffs Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.’s (collectively “Samsung”) First Set of Jurisdictional Interrogatories (Nos. 1-18) (the “Interrogatories”).

I. OBJECTIONS AND RESPONSES

INTERROGATORY NO. 1:

Describe in detail the complete factual basis for Your statement on June 21, 2024 that “[w]hether CyWee dismisses the case and CM HK, Ltd. sues or CyWee obtains more patents from CM HK, Ltd. to add to the present case is under consideration by others,” including what those considerations are and what persons or entities were evaluating those considerations.

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to this Request as irrelevant and burdensome in whole as it relates to information not relevant to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the present case. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

This statement was made by Michael Shore pursuant to Rule 408 in his role as CyWee Group’s counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group’s motivations.

CyWee Group did inquire about whether CM HK would assign patents to CyWee Group to add to the pending CyWee Group litigation against Samsung in the Eastern District of Texas. CM HK declined and instead decided to pursue enforcement of its patent rights without the participation or involvement of CyWee Group.

INTERROGATORY NO. 2:

Describe in detail the complete factual basis for Your contention on August 5, 2024 that “CyWee [Group] controls or has access to assert” the “patents,” including identifying the patents that CyWee Group controls (or controlled) or has (or had) access to assert and the circumstances under which, and the ways in which CyWee Group has or had this control or access to assert these patents.

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to this Request as irrelevant and burdensome in whole as it relates to information not relevant to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the present case. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

This statement was made by Michael Shore pursuant to Rule 408 in his role as CyWee Group’s counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group’s motivations or why CyWee Group believed patents held by CM HK were somehow available to CyWee Group. This statement was made by Michael Shore pursuant to Rule 408 in his role as CyWee Group’s counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group’s motivations.

CyWee Group did inquire about whether CM HK would assign patents to CyWee Group to add to the pending CyWee Group litigation against Samsung in the Eastern District of Texas. CM HK declined and instead decided to pursue enforcement of its patent rights without the participation or involvement of CyWee Group.

INTERROGATORY NO. 3:

Describe in detail the complete factual basis for Your statement on June 20, 2024 that “I spoke to Mr. Shey. He asks that Samsung put in writing what it wants and what it is willing to pay. If it only involves US patents, he can get Samsung an answer in 7-10 days. If the ask involves 21 Chinese patents, it will take 14-30 days, perhaps longer,” including identifying the U.S. and Chinese patents, identifying the CyWee Entity that owned those patents on June 20, 2024, explaining how Mr. Shey would facilitate a purchase of these patents by Samsung, and whether and to what extent Mr. Shey has or had the authority to sell these patents.

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to this Request as irrelevant and burdensome in whole as it relates to information not relevant to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the present case. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

This statement was made by Michael Shore pursuant to Rule 408 in his role as CyWee Group’s counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group’s motivations. CyWee Group did inquire about possibly acquiring additional patents from

1 CM HK but CM HK declined to pursue it.

2 Mr. Shey was willing to act as a broker/messenger of any deal between CM HK,
3 CyWee and Samsung, but no deal ever emerged. Samsung never made any offers, so there
4 were no efforts by Mr. Shey to determine if CM HK was willing to engage in a broader,
5 portfolio-wide agreement.

6 **INTERROGATORY NO. 4:**

7 Describe in detail the complete factual basis for Your statement on May 20, 2024
8 that “[p]er Mr. Shey, the CM HK Patents are available for purchase with a perpetual, paid-
9 up license back to CM HK, Ltd,” including identifying these patents, explaining how Mr.
10 Shey was knowledgeable on whether the “CM HK Patents are available to purchase,” and
11 whether and to what extent Mr. Shey has or had the authority to sell, license, assign, or
12 otherwise transfer CM HK’s patents.

13 **ANSWER:**

14 CM HK objects to this Request to the extent it seeks disclosure of information
15 protected from discovery by the attorney-client privilege, the work product doctrine, the
16 consulting expert privilege, the common interest doctrine, trade secret or proprietary
17 information, or any other applicable privilege, protection, or immunity. CM HK objects to
18 this Request as irrelevant and burdensome in whole as it relates to information not relevant
19 to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the
20 present case. CM HK objects to the Request to the extent it calls for information not in CM
21 HK’s possession, custody or control.

22 This statement was made by Michael Shore pursuant to Rule 408 in his role as
23 CyWee Group’s counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et*
24 *al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group’s
25 motivations. Mr. Shey was willing to act as a broker/messenger of any deal between CM
26 HK and Samsung, but no deal ever emerged. Samsung never made any offers, so there were

no efforts by Mr. Shey to determine if CM HK was willing to engage in a broader, portfolio-wide (or more limited) agreement.

INTERROGATORY NO. 5:

Describe in detail the complete factual basis for Your statement on May 25, 2025 that “[t]he reason CM HK had to file suit was that CyWee [Group] could not negotiate the transfer of the patents to CyWee [Group]. CM HK’s shareholders rejected all CyWee [Group] efforts/offers to obtain the patents.”

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to this Request as irrelevant and burdensome in whole as it relates to information not relevant to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the present case. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

CM HK has no knowledge of CyWee Group’s motivations. CyWee Group did inquire about possibly acquiring additional patents from CM HK but CM HK declined to pursue it.

INTERROGATORY NO. 6:

Describe in detail the complete factual basis for Your statement on September 10, 2024 that CyWee Group offered to “carry” \$25,000 of costs to be payable upon conclusion of a new lawsuit for patent infringement in exchange for several conditions, including that “Samsung will agree to answer or otherwise respond to the new [CM HK] suit within 45 days of service or November 1, 2024, whichever is later.”

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to this Request as irrelevant and burdensome in whole as it relates to information not relevant to a determination of personal jurisdiction, alter-ego nor does it cover patents asserted in the present case. CM HK objects to the Request to the extent it calls for information not in CM HK's possession, custody or control.

This statement was made by Michael Shore pursuant to Rule 408 in his role as CyWee Group's counsel in the case styled *CyWee Group Ltd. v. Samsung Electronics Co. Ltd. et al*, No. 2:17-cv-00140-RSP (E.D. Texas). CM HK has no knowledge of CyWee Group's motivations. CM HK has never agreed to pay any costs for CyWee Group.

INTERROGATORY NO. 7:

Identify Chauncey Shey and Shunnan Liou's employment positions in each CyWee Entity and in SBCVC since January 1, 2014, including identifying the dates of each held such positions or roles.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CM HK objects to the interrogatory as overly broad, unduly burdensome, and directed to information that is not relevant, not proportional to the needs of the case, and outside the relevant time frame for the case.

CMHK objects to the term SBCVC as it improperly identifies SBCVC as "Softbank China Ventures Capital Co.", SBCVC is an overarching acronym which covers several SoftBank China Entities including: SBCVC F-II, LP(SV) Limited, SBCVC F-II, Annex L.P., SBCVC Fund III Company Limited, Perfect Max Investment Limited, and Access

Universal Investment Ltd. Plaintiffs have not properly identified which entity they are seeking information from. Any additional information sought by way of this Interrogatory is irrelevant. See, e.g., *Blast Motion, Inc. v. Zepp Labs, Inc.*, 2015 WL 12564315, *3 (S.D. Cal. Dec. 2, 2015). The requested information pertaining to SBCVC is not needed to identify any potential witness, and is not relevant to any issue relating to personal jurisdiction of CM HK. CM HK further objects to the term “CyWee Entity” or CyWee Entities” as it seeks a response for any entity other than CM HK Limited.

Subject to and without waiving the foregoing objections, Mr. Shey has never held a position in any capacity at CM HK Ltd. Mr. Shey has held a director position at CyWeeMotion Group from March 11, 2016 to today. Mr. Shey has held a director position at CyWee Group Ltd. from August 16, 2016 to today.

Subject to and without waiving the foregoing objections, Dr. Liou has held the position of director at CM HK from March 22, 2016 to today. Dr. Liou has held the position of director at CyweeMotion Group from March 11, 2016 to today. Dr. Liou has held the position of CEO at CyweeMotion Group from March 1, 2016 to today. Dr. Liou has held the position of Senior Manager of Research and Development, and then VP of Engineering at CyWee Group Ltd. from October 15, 2007 to August 31, 2014.

INTERROGATORY NO. 8:

Describe in detail the circumstances under which CyWee Group, CyWeeMotion, and CM HK executed the Patent Assignment on September 25, 2024 (“the September 25, 2024 Assignment”), including the purpose of the September 25, 2024 Assignment and which CyWee Entity You contend owned the patents listed in Annex A of the September 25, 2024 Assignment (including the Asserted Patents) immediately prior to the September 25, 2024 Assignment being executed.

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information

protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK further objects to this request as duplicative. *See* CM HK's May 8, 2025 Response to Interrogatory 6, CM HK, Ltd.'s Responses and Objections to Plaintiffs' First set of Interrogatories (Nos. 1-11).

Subject to and without waiving the foregoing general and specific objections, this agreement was executed as part of CM HK's pre-suit diligence and the circumstances and reasoning behind that decision are privileged attorney-work product and attorney-client communications. CM HK owned all the patents listed in Annex A both before and after the September 25, 2024 Assignment was executed. CM HK has owned all the patents listed in Annex A since March 31, 2017.

INTERROGATORY NO. 9:

Describe in detail CyWeeMotion's efforts in response to CyWee Group's failure to assign the two patents asserted in *CyWee Group Ltd. v. Samsung Elecs. Co.*, No. 2:17-cv-00140-WCB-RSP (E.D. Tex.) to CyWeeMotion three months after dismissal of CyWee Group's litigation against Apple as provided by the March 28, 2016 Patent Assignment and License Agreement between CyWee Group and CyWeeMotion.

ANSWER:

CM HK objects to this Request to the extent it seeks disclosure of information protected from discovery by the attorney-client privilege, the work product doctrine, the consulting expert privilege, the common interest doctrine, trade secret or proprietary information, or any other applicable privilege, protection, or immunity. CM HK objects to the interrogatory as overly broad, unduly burdensome, and directed to information that is not relevant, not proportional to the needs of the case, and outside the relevant time frame for the case.

Subject to and without waiving the foregoing general and specific objections, In the Settlement Agreement between Apple and CyWee Group, Apple agreed that, in case CyWee Group obtains payments from certain third parties (as specified in such Settlement Agreement), either through licensing or enforcement of judgment based upon the third parties' infringement of CyWee Group's patents, Apple may pay a certain amount of fees in order to continue to use the certain patents licensed by CyWee Group (if Apple doesn't make such payment under this condition, then such licensing from CyWee Group will terminate after a period of time). The '438 and '978 patents which are the two patents asserted in the 2017 action falls into the category as described above.

INTERROGATORY NO. 10:

Identify, separately for each CyWee Entity, the revenue, the quantity of goods or services sold, and costs on a quarterly basis since January 1, 2014.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK further objects to the time frame covered by this interrogatory as overbroad and unduly burdensome. CM HK objects to the relevance of this request because it reaches far beyond the scope of personal jurisdiction and alter-ego. CM HK further objects to the term "CyWee Entity" or CyWee Entities" as it seeks a response for any entity other than CM HK Limited.

CM HK will not respond to this interrogatory because it seeks information with no relevance to any jurisdictional claims that have been asserted in this case.

INTERROGATORY NO. 11:

Identify all Persons who have, since January 1, 2014, invested in, owned any portion of, exercised any control over, provided capital to or for, donated or provided gifts to, or otherwise transferred money or other capital (other than in exchange for products or services) to any of the CyWee Entities, including identifying the CyWee Entity to whom the

money or other capital was transferred and identifying the amounts and types of investment, capital, gifts, or money provided by each Person.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CM HK objects to this interrogatory as overbroad and unduly burdensome. CM HK further objects to the time frame covered by this interrogatory as overbroad and unduly burdensome. CM HK objects to the term “CyWee Entity” or CyWee Entities” as it seeks a response for any entity other than CM HK Limited and any relationship other than CM HK Ltd. and CyWee Group Ltd. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

Ownership interests for **CyweeMotion** Group Ltd.

From April 14, 2016 to April 21, 2016:

1. CyWee Group Limited (78%)
2. Amber Dragon Holdings Limited (12.5%)
3. Pure Shine International Limited (9.5%)

From April 22, 2016 through October 28, 2020:

1. CyWee Group Limited (71.6757%)
2. Bluocean Inc.(8.1081%)
3. Amber Dragon Holdings Limited (11.4865%)
4. Pure Shine International Limited (8.7297%)

From October 29, 2020 through today:

1. CyWee Group Limited (39.28%)
2. Bluocean Inc. (7.01%)
3. Cosmic Fortune Global Limited (29.83%)
4. Paragon Investment Limited (3.31%)

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CM HK’S Objections and Responses to
Plaintiffs’ First Set of Jurisdictional Interrogatories

1 5. Amber Dragon Holdings Limited (11.92%)

2 6. Pure Shine International Limited (8.64%)

3 **Ownership interests for CM HK**

4 1. CM Investment Inc. (100%)

5 **Ownership interests for CM Investment Inc.**

6 1. CyweeMotion Ltd. (100%)

7 **Ownership interests for CyweeMotion Ltd.**

8 1. CyweeMotion Group Ltd. (100%)

9 **INTERROGATORY NO. 12:**

10 Identify any Persons who have (or had at any time since January 1, 2014) ownership,
11 shareholding, or legal or management control in a CyWee Entity, including identifying the
12 CyWee Entity it has ownership, shareholding, or legal or management control in, describing
13 the nature of that ownership or control, and identifying its ownership percentage in that
14 CyWee Entity.

15 **ANSWER:**

16 CM HK objects to this interrogatory as comprising multiple, discrete subparts.
17 CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK further
18 objects to this request as duplicative. *See* CM HK's May 8, 2025, CM HK, Ltd.'s Responses
19 and Objections to Plaintiffs' First set of Interrogatories (Nos. 1-11). CM HK further objects
20 to the time frame covered by this interrogatory as overbroad and unduly burdensome. There
21 are 7 different entities covered by the single definition of "CyWee Entity" as defined by
22 Plaintiffs and are companies whom CM HK does not have any control over. Plaintiffs have
23 not properly identified which entity they are seeking information from. The requested
24 information pertaining to "CyWee Entities" is not needed to identify any potential witness,
25 and is not relevant to any issue relating to personal jurisdiction of CM HK. Further, this
26 request reaches far beyond the scope of personal jurisdiction and alter-ego. CM HK further

objects to the term “CyWee Entity” or CyWee Entities” as it seeks a response for any entity other than CM HK Limited and CyWee Group Ltd.

Subject to and without waiving the forging general and specific objections, see response to Interrogatory 7 and 11.

CyweeMotion Group Ltd. has the following board members: Liou Shun-nan, Chauncey Shey, Fan Xiaohai, Liu Helena, Su Chu-Ting, Wang Can, Yan Ying.

Shun-nan Liou is also the sole director of CM HK, CM Investment Inc., and CyweeMotion Ltd.

INTERROGATORY NO. 13:

For each CyWee Entity, identify each bank account owned by that CyWee Entity at any point on or after January 1, 2014. The identification should include (a) the address of the bank at which the account is maintained, and (b) purpose of the bank account.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK further objects to this request as duplicative. There are 7 different entities covered by the single definition of “CyWee Entity” as defined by Plaintiffs and are companies whom CM HK does not have any control over nor access to their financial information. Plaintiffs have not properly identified which entity they are seeking information from. CM HK further objects to the term “CyWee Entity” or CyWee Entities” as it seeks a response for any entity other than CM HK Limited and CyWee Group Ltd. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control. CM HK objects to this Request as overbroad and unduly burdensome.

Subject to and without waiving the forging general and specific objections:

CM HK, CM Investment Inc., and CyWeeMotion Group Ltd. each has a separate corporate account at Taipei Fubon Bank.

CyWee Group Ltd. banks at Silicon Valley Bank.

INTERROGATORY NO. 14:

Identify all of the current and former officers, directors, founders, registered agents, and shareholders of each CyWee Entity since January 1, 2014, including identifying the individual's title in the CyWee Entity and the dates of each held such title.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK objects to this request as duplicative. CM HK further objects to the time frame covered by this interrogatory as overbroad and unduly burdensome. There are 7 different entities covered by the single definition of "CyWee Entity" as defined by Plaintiffs and are companies whom CM HK Ltd. does not have any control over. Plaintiffs have not properly identified which entity they are seeking information from. CM HK further objects to the term "CyWee Entity" or CyWee Entities" as it seeks to require evidence or information from any entity other than CM HK Limited and CyWee Group Ltd. CM HK objects to this Request as overbroad and unduly burdensome. CM HK objects to the Request to the extent it calls for information not in CM HK's possession, custody or control.

Subject to and without waiving the forging general and specific objections, see answers to Interrogatories 7, 11, and 12.

INTERROGATORY NO. 15:

Identify all meetings of the directors, executives, officers, investors, shareholders, employees, or other representatives of each CyWee Entity since January 1, 2014, including identifying each participating individual's title in the CyWee Entity and the dates each held such title.

ANSWER:

CM HK objects to this interrogatory as comprising multiple, discrete subparts. CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK objects to this request as duplicative. CM HK further objects to the time frame covered by this interrogatory as overbroad and unduly burdensome. There are 7 different entities covered by the single definition of “CyWee Entity” as defined by Plaintiffs and are companies whom CM HK Ltd. does not have any control over. Plaintiffs have not properly identified which entity they are seeking information from. CM HK further objects to the term “CyWee Entity” or CyWee Entities” as it seeks to require evidence or information from any entity other than CM HK Limited and CyWee Group Ltd. CM HK objects to this Request as overbroad and unduly burdensome. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control.

Subject to and without waiving the forging general and specific objections, see answers to Interrogatories 7, 11, and 12.

INTERROGATORY NO. 16:

Identify all current or former employees, independent contractors, consultants, freelance worker, or agents of each CyWee Entity since January 1, 2014.

ANSWER:

CM HK objects to this interrogatory on the grounds that it seeks information that is not relevant to any party’s claim or defense and is not proportional to the needs of the case under Rule 26(b)(1) of the Federal Rules of Civil Procedure. CM HK further objects to this interrogatory to the extent it seeks disclosure of information protected by the attorney-client privilege, the attorney work product doctrine, and/or the common interest doctrine. CM HK objects to the interrogatory as overly broad and unduly burdensome to the extent it is not reasonably limited in scope or time. CM HK further objects to the term “CyWee Entity” or CyWee Entities” as it seeks to require evidence or information from any entity other than

CM HK Limited and CyWee Group Ltd. There are 7 different entities covered by the single definition of “CyWee Entity” as defined by Plaintiffs and are companies whom CM HK Ltd. does not have any control over. CM HK objects to the terms “independent contractors,” “freelance workers,” and “consultants” as individuals not party to this case and whose identification is not likely to lead to any relevant evidence pertaining to the discovery of personal jurisdiction or alter-ego. CM HK objects to the Request to the extent it calls for information not in CM HK’s possession, custody or control. CM HK objects to this Request as overbroad and unduly burdensome.

Subject to and without waiving the foregoing general and specific objections:

a) There are no employees in CM HK, CM Investments Inc., CyweeMotion Ltd.

b) CyweeMotion Group Ltd. employees: Shunnan Liou, Xiaojun Wang, Huan Chang, Omar Lin, Tiffany Lin

c) None of CM HK’s employees work for CyWee Group Ltd.

INTERROGATORY NO. 17:

For each CyWee Entity, identify all of the physical offices since January 1, 2014, including identifying the dates the CyWee Entity occupied and/or otherwise used those offices and describing the nature of the CyWee Entity’s operations conducted at those offices.

ANSWER:

The physical office for CM HK, CM Investment Inc., CyweeMotion Ltd., and CyweeMotion Group Ltd is: 10F-3, No.335, Ruiguang Rd., Neihu Dist., Taipei 114063, Taiwan.

CM HK does not share physical office space with CyWee Group Ltd.

INTERROGATORY NO. 18:

For each CyWee Entity, identify all assets that the CyWee Entity had ownership interest in,

1 including identifying nature of the ownership interest and the dates that the CyWee Entity
2 possessed this ownership interest.

3 **ANSWER:**

4 CM HK objects to this interrogatory as comprising multiple, discrete subparts.
5 CMHK objects to this interrogatory as overbroad and unduly burdensome. CM HK further
6 objects to this request as duplicative. CM HK objects to the interrogatory as overly broad
7 and unduly burdensome to the extent it is not reasonably limited in scope or time. CM HK
8 further objects to the term “CyWee Entity” or CyWee Entities” as it seeks to require
9 evidence or information from any entity other than CM HK Limited and CyWee Group
10 Ltd. There are 7 different entities covered by the single definition of “CyWee Entity” as
11 defined by Plaintiffs and are companies whom CM HK Ltd. does not have any control over.
12 Plaintiffs have not properly identified which entity they are seeking information from. CM
13 HK objects to the term “assets” as it is ambiguous and broad.

14 CM HK is willing to meet and confer over the scope and information being sought
15 by this request.
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1 Date: July 8, 2025

By: /s/ Christopher L. Evans
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Attorneys for Defendants
CM HK, Ltd.

17 **CERTIFICATE OF SERVICE**

18 The undersigned hereby certifies that Plaintiffs' counsel of record are being served with
19 a copy of Defendant CM HK, Ltd's Responses and Objections to Plaintiffs' First Set of
20 Jurisdictional Interrogatories via email on July 8, 2025.
21

22 /s/ Christopher L. Evans
23 Christopher L. Evans
24
25
26

27 CASE NO. 4:24-CV-06567-JST

CM HK'S Objections and Responses to
Plaintiffs' First Set of Jurisdictional Interrogatories

Exhibit 6

From: [Michael Shore](#)
To: [O'Brien, Karen R.](#); [Caroline Johnson](#)
Cc: [Team Samsung CyWee](#); [Brann, Elizabeth L.](#); [Chris Evans](#); [chiji](#); [Zachary Della Porta](#)
Subject: [EXT] RE: CyWee Group v. Samsung Electronics Co., Ltd., et al., No. 2:17-cv-140-WCB (E.D. Tex)
Date: Tuesday, September 10, 2024 7:20:49 AM
Attachments: [image001.png](#)

--- External Email ---

[Report Suspicious](#)

Elizabeth,

CyWee will not agree to pay costs. To avoid a dispute, CyWee offers to carry \$25,000 of the costs until conclusion of the new suit. This offer requires an agreement to the following:

1. Samsung's counsel will accept service of the new lawsuit;
2. Samsung will agree to answer or otherwise respond to the new suit within 45 days of service or November 1, 2024, whichever is later;
3. Samsung will not contest the Eastern District of Texas as an appropriate venue for the second suit;
4. Samsung will agree that any discovery or documents exchanged in the prior lawsuit will be usable in the new lawsuit;
5. The form of the protective order in the new suit will be the same as the old suit; and
6. Experts cleared under the PO in the old suit will not have to be redesignated or wait for an objection period but shall continue to have access to the confidential materials already provided in the old suit and to be provided in the new suit.

Mr. Shey and Mr. Fan are traveling today and tomorrow, but I can get any response to them on Thursday.

Best,

Michael

From: Michael Shore
Sent: Thursday, September 5, 2024 12:56 PM
To: O'Brien, Karen R. <karenobrien@paulhastings.com>; Caroline Johnson <cjohnson@shorefirm.com>
Cc: Team Samsung <TeamSamsungCywee@paulhastings.com>; Elizabeth Brann <elizabethbrann@paulhastings.com>
Subject: RE: CyWee Group v. Samsung Electronics Co., Ltd., et al., No. 2:17-cv-140-WCB (E.D. Tex)

Elizabeth,

I will forward to client in China and get back to you next week.

CMHK, Ltd. asks that you agree to accept service of the new lawsuit. The demand is \$11 per phone sold in the US or \$600,000,000, payable in 6 installments for a license to the full portfolio. The case is ready to file.

Best,

Michael

From: O'Brien, Karen R. <karenobrien@paulhastings.com>
Sent: Thursday, September 5, 2024 12:39 PM
To: Michael Shore <mshore@shorefirm.com>; Caroline Johnson <cjohnson@shorefirm.com>
Cc: Team Samsung <TeamSamsungCywee@paulhastings.com>; Elizabeth Brann <elizabethbrann@paulhastings.com>
Subject: CyWee Group v. Samsung Electronics Co., Ltd., et al., No. 2:17-cv-140-WCB (E.D. Tex)

CAUTION: External Email!

Mr. Shore,

Please see attached correspondence from Elizabeth Brann regarding the above matter.

Regards,
Karen



Karen O'Brien | Client Service Specialist

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Exhibit 7

From: [Bratton, Ariell](#)
To: [Chris Evans](#); [Michael Shore](#)
Cc: [zdellaporta@shorefirm.com](#); [Caroline Johnson](#); [Chijioko Offor](#); [Andrew Huffstetler](#); [Team Samsung CyWee](#)
Subject: RE: CM HK: Jurisdictional Discovery
Date: Wednesday, June 18, 2025 4:23:15 PM
Attachments: [image001.png](#)

Hi Chris,

Thank you for the meet and confer yesterday. As an update, we are still discussing the jurisdictional discovery that CM HK served with Samsung.

Thanks,
Ariell

From: Bratton, Ariell <ariellbratton@paulhastings.com>
Sent: Tuesday, June 17, 2025 9:35 AM
To: Chris Evans <chris@offorevans.com>; Michael Shore <mshore@shorefirm.com>
Cc: zdellaporta@shorefirm.com; Caroline Johnson <caroline@offorevans.com>; Chijioko Offor <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: RE: CM HK: Jurisdictional Discovery

Counsel,

Ahead of our meet and confer today, we wanted to send along the below, counter-proposal for the schedule. In our view, the parties' proposals are not far off and ours essentially just builds in a briefing schedule. Hopefully we can reach an agreement. Please note that this proposed schedule assumes we receive complete responses.

Original Proposed Date	New Proposed Date	NDCA Event
Monday, June 9	N/A	Samsung serves first round of discovery requests
Wednesday, July 9		CM HK serves responses to discovery requests, including document production
~~Wednesday, July 23~~		~~Samsung serves second round of discovery requests~~
~~Friday, August 22~~		~~CM HK serves responses to second round of discovery requests~~
Friday, August 29	~~Wednesday, July 23~~	Deadline to serve deposition notices
Monday, September 29	~~Wednesday, August 6~~	Close of jurisdictional discovery
Monday, October 13	~~Wednesday, August 27~~	Samsung files amended complaint
Monday, October 27	~~Wednesday, September 10~~	CM HK files MTD, if desired
Monday, November 10	~~Wednesday, September 24~~	Opposition to MTD
Monday, November 17	~~Wednesday, October 1~~	Reply to MTD
Monday, December 1	~~Monday, October 7~~	Earliest Date for Hearing on MTD

Thanks,
Ariell

From: Chris Evans <chris@offorevans.com>
Sent: Tuesday, June 10, 2025 8:25 AM
To: Bratton, Ariell <ariellbratton@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Vujcic, Sasha <sashavujcic@paulhastings.com>

Cc: zdellaporta@shorefirm.com; Caroline Johnson <caroline@offorevans.com>; Chijioke Offor <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] Re: CM HK: Jurisdictional Discovery

--- External Email ---

[Report Suspicious](#)

Ariell,

Here is our proposed schedule:

Date	NDCA Event
July 27, 2025	Close of jurisdictional discovery
August 4, 2025	Deadline for Samsung to file amended complaint

This schedule provides you 74 days to take jurisdictional discovery (May 15, 2025 to July 27, 2025).

We are not available to meet and confer this week but potentially could next week. Send us some proposed dates and times. We would also like confer about our forthcoming motion to transfer to the Eastern District of Texas under Section 1404.

Sincerely,

Chris Evans

From: Bratton, Ariell <ariellbratton@paulhastings.com>
Date: Monday, June 9, 2025 at 5:08 PM
To: Michael Shore <mshore@shorefirm.com>, Chris Evans <chris@offorevans.com>, Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, Caroline Johnson <caroline@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, Andrew Huffstetler <andrew@offorevans.com>, Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: RE: CM HK: Jurisdictional Discovery

Michael,

You have our position on this. As we previously communicated to you, we think the EDTX action should be stayed and you all declined.

The Court ordered jurisdictional discovery in the NDCA case and we are proceeding according to the Court's orders. We will be seeking to have the Court enter a schedule, even if opposed. That said, we would prefer to compromise and agree on a schedule, so please send us a counter-proposal if you disagree with our proposed schedule.

Thank you,
Ariell

From: Michael Shore <mshore@shorefirm.com>
Sent: Friday, June 6, 2025 6:36 PM
To: Bratton, Ariell <ariellbratton@paulhastings.com>; Chris Evans <chris@offorevans.com>; Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Zachary Della Porta <zdellaporta@shorefirm.com>; Caroline Johnson <caroline@offorevans.com>; chiji <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] RE: CM HK: Jurisdictional Discovery

Dear Ariell,

This schedule effectively renders the California case prudentially moot. The Eastern District of Texas case will be halfway to trial by the end of your alter ego discovery schedule, and that assumes the Court rules on day after the Motion to Dismiss is filed.

Given this Court's historical pace on dispositive motions (about the national average), the EDTX case will be only weeks from jury trial. It is clear Samsung does not want to spend money on jurisdictional/alter ego discovery now. Samsung does not want a ruling to occur for months despite the EDTX case continuing. Why? This schedule makes no sense if Samsung believes the NDCA case was correctly filed. I believe I know, but would like to hear it from Samsung.

Best,

Michael

From: Bratton, Ariell <ariellbratton@paulhastings.com>

Sent: Friday, June 6, 2025 2:46 PM

To: Chris Evans <chris@offorevans.com>; Vujcic, Sasha <sashavujcic@paulhastings.com>

Cc: Michael Shore <mshore@shorefirm.com>; Zachary Della Porta <zdellaporta@shorefirm.com>; Caroline Johnson <caroline@offorevans.com>; chiji <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung <TeamSamsungCywee@paulhastings.com>

Subject: RE: CM HK: Jurisdictional Discovery

CAUTION: External Email!

Counsel,

We updated the proposed schedule for jurisdictional discovery. Please let us know if you agree. Please note that we will seek to have the Court enter this schedule. Please let us know if you would like to discuss.

Date	NDCA Event
Monday, June 9	Samsung serves first round of discovery requests
Wednesday, July 9	CM HK serves responses to first round of discovery requests, including document production
Wednesday, July 23	Samsung serves second round of discovery requests
Friday, August 22	CM HK serves responses to second round of discovery requests
Friday, August 29	Deadline to serve deposition notices
Monday, September 29	Close of jurisdictional discovery
Monday, October 13	Samsung files amended complaint
Monday, October 27	CM HK files MTD, if desired
Monday, November 10	Opposition to MTD
Monday, November 17	Reply to MTD
Monday, December 1	Earliest Date for Hearing on MTD

Best regards,

Ariell

From: Chris Evans <chris@offorevans.com>

Sent: Monday, June 2, 2025 10:22 AM

To: Bratton, Ariell <ariellbratton@paulhastings.com>; Vujcic, Sasha <sashavujcic@paulhastings.com>

Cc: Michael Shore <mshore@shorefirm.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>; Caroline Johnson <caroline@offorevans.com>; Chijioke Offor <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>

Subject: [EXT] Re: CM HK: Jurisdictional Discovery

Ariell,

We will not agree to stay the Texas action.

Sincerely,

Chris Evans

From: Bratton, Ariell <ariellbratton@paulhastings.com>

Date: Monday, June 2, 2025 at 1:08 PM

To: Chris Evans <chris@offorevans.com>, Vujcic, Sasha <sashavujcic@paulhastings.com>

Cc: Michael Shore <mshore@shorefirm.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, Caroline Johnson <caroline@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, Andrew Huffstetler <andrew@offorevans.com>, Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>

Subject: RE: CM HK: Jurisdictional Discovery

Chris,

We do not agree to transferring and consolidating in EDTX. Instead, we propose that the parties agree to stay the Texas action pending personal jurisdiction discovery in NDCA and the IPRs that Samsung has filed. This stay would avoid the expense of litigating in three forums at once.

Thanks,
Ariell

From: Chris Evans <chris@offorevans.com>
Sent: Thursday, May 29, 2025 7:05 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Michael Shore <mshore@shorefirm.com>; zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>; Caroline Johnson <caroline@offorevans.com>; Chijioke Offor <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>; Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] Re: CM HK: Jurisdictional Discovery

Sasha,

Any thoughts on my proposal to transfer and consolidate in the EDTX or on the discovery plan?

Sincerely,

Chris Evans

From: Chris Evans <chris@offorevans.com>
Date: Tuesday, May 27, 2025 at 10:11 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>
Cc: Michael Shore <mshore@shorefirm.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, Caroline Johnson <caroline@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, Andrew Huffstetler <andrew@offorevans.com>, Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: Re: CM HK: Jurisdictional Discovery

Sasha,

Please draft a joint motion to stay all current deadlines that we can file this week. Your proposal below seems like substantial overkill. One deposition should be sufficient, and we'd agree to produce all relevant documents (that haven't been produced already) prior to the deposition. Alternatively, let's stipulate to transfer consolidate the cases in E.D. Texas where you can pursue alter ego discovery as part of regular discovery and amend to add an alter ego claim if you think you find evidence to support it. This would be the most efficient course of action.

Sincerely,

Chris Evans

From: Vujcic, Sasha <sashavujcic@paulhastings.com>
Date: Thursday, May 22, 2025 at 8:48 PM
To: Chris Evans <chris@offorevans.com>
Cc: Michael Shore <mshore@shorefirm.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, Caroline Johnson <caroline@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, Andrew Huffstetler <andrew@offorevans.com>, Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: CM HK: Jurisdictional Discovery

Chris,

We write to confirm that we consider all NDCA deadlines other than the case management conference and associated deadline contemplated in last week's order off calendar. Therefore, we will not serve responses to the discovery requests that CM HK served in NDCA on April 23 until jurisdictional discovery is resolved.

Below is our proposed schedule for jurisdictional discovery:

Date	NDCA Event
Monday, June 2	Samsung serves first round of discovery requests
Wednesday, July 2	CM HK serves responses to first round of discovery requests
Wednesday, July 23	Samsung serves second round of discovery requests
Friday, August 22	CM HK serves responses to second round of discovery requests
Friday, August 29	Samsung serves deposition notices
Friday, September 12	Depositions begin
Friday, October 10	File amended complaint
Friday, October 24	CM HK files MTD, if desired
Friday, November 7	Opposition to MTD
Friday, November 14	Reply to MTD
Friday, November 26	Earliest Date for Hearing on MTD

Please let us know whether CM HK agrees with this schedule.

Thanks,
Sasha



Sasha Vujcic | Associate

Paul Hastings LLP | 4655 Executive Drive, Suite 350, San Diego, CA 92121 | Direct: +1.858.458.3000 | Main: +1.858.458.3000 | Fax: +1.858.458.3005 | [email](mailto:sasha.vujcic@paulhastings.com) | www.paulhastings.com

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Exhibit 8

From: [Vujicic, Sasha](#)
To: [Chris Evans](#); [Michael Shore](#); [zdellaporta@shorefirm.com](#); [Caroline Johnson](#); [Chijioke Offor](#); [Andrew Huffstetler](#)
Cc: [Team Samsung CyWee](#)
Subject: RE: Samsung v. CM HK: Jurisdictional Discovery Schedule
Date: Monday, July 7, 2025 5:01:37 PM
Attachments: [image001.png](#)
[CM HK NDCA Joint Stip re Jurisdictional Discovery\(184279578.2\).docx](#)

Counsel,

We are following up to see if you agree with the attached, proposed stipulation regarding the jurisdictional discovery schedule or if you would like to discuss the stipulation.

Thank you,
Sasha

From: Bratton, Ariell <ariellbratton@paulhastings.com>
Sent: Friday, June 27, 2025 12:58 PM
To: Chris Evans <chris@offorevans.com>; Michael Shore <mshore@shorefirm.com>; zdellaporta@shorefirm.com; Caroline Johnson <caroline@offorevans.com>; Chijioke Offor <chiji@offorevans.com>; Andrew Huffstetler <andrew@offorevans.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: Samsung v. CM HK: Jurisdictional Discovery Schedule

Counsel,

Following up on our meet and confer regarding the jurisdictional discovery schedule, we agree to move the amended complaint deadline to August 22, 2025. We prepared the attached joint stipulation, which moves up the dates that follow for consistency.

Please let us know if you agree with the attached, proposed stipulation or if you would like to discuss.

Thank you,
Ariell



Ariell Bratton | Associate, Litigation Department

Paul Hastings LLP | 4655 Executive Drive, Suite 350, San Diego, CA 92121 | Direct:
+1.858.458.3017 | Main: +1.858.458.3000 | Fax: +1.858.458.3117 |
ariellbratton@paulhastings.com | www.paulhastings.com

Exhibit 9

ELIZABETH L. BRANN (SB# 222873)
elizabethbrann@paulhastings.com
ARIELL N. BRATTON (SB# 317587)
ariellbratton@paulhastings.com
SASHA VUJCIC (SB# 332766)
sashavujcic@paulhastings.com
PAUL HASTINGS LLP
4655 Executive Dr., Suite 350
San Diego, CA 92121
Telephone: 1(858) 458-3000
Facsimile: 1(858) 458-3005

[ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD.,

Defendants.

CASE NO. 4:24-CV-06567-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
JURISDICTIONAL DISCOVERY
SCHEDULE**

DEMAND FOR JURY TRIAL

Pursuant to Local Rule 7-12, Plaintiffs Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) and Defendant CM HK, Ltd. (collectively, “the Parties”) respectfully submit the following joint stipulation regarding the jurisdictional discovery schedule. A proposed order is submitted herewith.

WHEREAS, the Court issued the Order Granting Defendant CM HK, Ltd.’s Motion to Dismiss on May 15, 2025, but granted Samsung leave to amend after conducting jurisdictional discovery;

WHEREAS, the parties met and conferred on June 17, 2025 and agreed on the following, proposed schedule; and

WHEREAS, the following, proposed schedule does not affect the date of any currently scheduled event or deadline.

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE to request an order from the Court formally instituting the following schedule.

Proposed Date	Event
Monday, June 9	Samsung serves first round of discovery requests
Wednesday, July 9	CM HK serves responses to discovery requests, including document production
Wednesday, July 23	Deadline to serve deposition notices
Wednesday, August 6	Close of jurisdictional discovery
Friday, August 22	Samsung files amended complaint
Friday, September 5	CM HK files motion to dismiss, if desired
Friday, September 19	Opposition to any motion to dismiss
Friday, September 26	Reply to any motion to dismiss
Friday, October 10	Earliest date for hearing on any motion to dismiss

1
2 DATED: _____, 2025

Respectfully submitted,

By: /s/

ELIZABETH L. BRANN (SB# 222873)
elizabethbrann@paulhastings.com
ARIELL N. BRATTON (SB# 317587)
ariellbratton@paulhastings.com
SASHA VUJCIC (SB# 332766)
sashavujcic@paulhastings.com
PAUL HASTINGS LLP
4655 Executive Dr., Suite 350
San Diego, CA 92121
Telephone: 1(858) 458-3000
Facsimile: 1(858) 458-3005

Robert Laurenzi (*Pro Hac Vice*)
robertlaurenzi@paulhastings.com
PAUL HASTINGS LLP
200 Park Avenue, 26th Floor
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 318-6100

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and Samsung
Electronics America, Inc.

By: /s/

[CM HK]

Attorneys for Defendant CM HK, Ltd.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Hon. Jon S. Tigar
United States District Judge

Exhibit 10

ELIZABETH L. BRANN (SB# 222873)
elizabethbrann@paulhastings.com
ARIELL N. BRATTON (SB# 317587)
ariellbratton@paulhastings.com
SASHA VUJCIC (SB# 332766)
sashavujcic@paulhastings.com
PAUL HASTINGS LLP
4655 Executive Dr., Suite 350
San Diego, CA 92121
Telephone: 1(858) 458-3000
Facsimile: 1(858) 458-3005

[ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD.,

Defendant.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' NOTICE OF RULE
30(b)(6) DEPOSITION REGARDING
JURISDICTION TO DEFENDANT**

DEMAND FOR JURY TRIAL

1 Pursuant to Rule 30(b)(6), PLEASE TAKE NOTICE that, beginning at 9:30 a.m. PDT on
2 August 4, 2025, Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
3 (collectively, “Defendants”), by their undersigned attorneys, will take the remote oral and
4 videotaped deposition of CM HK, Ltd. (“CM HK”), by one or more officers, directors, or
5 managing agents or other person(s) designated to testify on its behalf, regarding the Deposition
6 Topics identified below.

7 The deposition will be reported by a duly authorized court reporter and certified
8 videographer. The deposition will be conducted before an officer authorized to administer oaths
9 and will continue from day-to-day, weekends and legal holidays excluded, until completed, or
10 according to a Court-ordered schedule. The deposition will be taken for the purpose of discovery,
11 for use at trial or any hearing in this matter, and for any other purpose permitted by the Federal
12 Rules of Civil Procedure.

13 In accordance with Fed. R. Civ. P. 30(b)(6), CM HK is required to designate one or more
14 of its principals, officers, directors, managing agents, or other persons who consent to testify on
15 its behalf with respect to all information that is known or reasonably available to CM HK
16 concerning the topics set forth below.

17 No later than five (5) business days before the noticed deposition, CM HK shall identify
18 in writing each witness that will testify in response to this notice and the specific topics on which
19 each such witness will testify. To the extent each identified witness will rely on documents or
20 information not yet produced in this litigation, CM HK shall produce those documents or
21 information as soon as possible, and no less than five (5) business days prior to the date of the
22 deposition.

23 This deposition is noticed, and will be taken, without prejudice to Plaintiffs’ right to
24 depose any witness in his or her individual capacity, irrespective of whether such witness is also
25 designated to testify on behalf of CM HK in response to this notice. Plaintiffs reserve the right to
26 ask related or follow-up questions to any testimony provided whether such questions fall within
27 the scope of the topics set forth in this Notice.
28

DEFINITIONS

1
2 1. As used herein, “and” and “or” shall be construed conjunctively and disjunctively
3 so as to acquire the broadest meaning possible.

4 2. As used herein, “any” and “all” shall each be construed to mean “any and all,” so as
5 to acquire the broadest meaning possible.

6 3. As used herein, “include” and “including” shall be construed to mean “without
7 limitation,” so as to acquire the broadest meaning possible.

8 4. As used herein, “referring,” “relating,” or “related” to any given subject shall mean,
9 without limitation, identifying, describing, discussing, assessing, stating, reflecting, constituting,
10 containing, embodying, tending to support or refute, referring directly or indirectly to, in any way,
11 the particular subject matter identified.

12 5. As used herein, the term “Documents” has the same meaning as the term
13 “document” as used and defined in Rule 34 of the Federal Rules of Civil Procedure and therefore
14 includes, without limitation, electronic data and tangible things such as hard drives, back-up disks,
15 and back-up tapes.

16 6. The terms “Plaintiffs” and “Samsung” shall mean Samsung Electronics Co., Ltd.
17 and Samsung Electronics America, Inc, collectively or individually.

18 7. As used herein, the terms “CM HK,” “Defendant,” “You,” and “Your” mean CM
19 HK, Ltd. and its board members, officers, directors, current and former employees, counsel, agents,
20 consultants, representatives, and any other persons acting on behalf of any of the foregoing, and
21 CM HK’s affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors
22 and successors in interest, and any other legal entities, whether foreign or domestic, that are owned
23 or controlled by CM HK, and all predecessors and successors in interest to such entities or to the
24 Asserted Patents, including but not limited to CM HK.

25 8. As used herein, “CyWee Group” means CyWee Group Ltd. and its board members,
26 officers, directors, current and former employees, counsel, agents, consultants, representatives, and
27 any other persons acting on behalf of any of the foregoing, and CyWee Group’s affiliates, parents,
28

1 divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest,
2 and any other legal entities, whether foreign or domestic, that are owned or controlled by CyWee
3 Group, and all predecessors and successors in interest to such entities or to the Asserted Patents,
4 including but not limited to CyWee Group.

5 9. “CyWee Entity” means any of CyWee Group, CyWeeMotion Group Ltd., CyWee
6 Motion Ltd., CyWee Motion Inc., CyWeeMotion HK Ltd., CM Investment Inc., or CM HK.

7 10. “CyWee Entities” means each of CyWee Group, CyWeeMotion Group Ltd., CyWee
8 Motion Ltd., CyWee Motion Inc., CyWeeMotion HK Ltd., CM Investment Inc., and CM HK.

9 11. As used herein, “SBCVC” means Softbank China Venture Capital Co. Ltd and its
10 board members, officers, directors, current and former employees, counsel, agents, consultants,
11 representatives, and any other persons acting on behalf of any of the foregoing, and SBCVC’s
12 affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors and
13 successors in interest, and any other legal entities, whether foreign or domestic, that are owned or
14 controlled by SBCVC, and all predecessors and successors in interest to such entities or to the
15 Asserted Patents, including but not limited to SBCVC.

16 12. As used herein, the term “affiliate” or “affiliated entities” means all predecessors,
17 successors, acquisitions, all past and present parents, subsidiaries, and divisions thereof, and all
18 past and present board members, directors, officers, employees, agents, and representatives
19 (including consultants or attorneys).

20 13. As used herein, the terms “Action” and “this Action” mean the above-captioned
21 litigation, pending in the United States District Court for the Northern District of California.

22 14. As used herein, the term “Asserted Patents” means United States Patent Nos.
23 10,852,846 (“the ’846 Patent”) and 11,698,687 (“the ’687 Patent”).

24 15. Motion Sensing Technology – any technology that is related to the family of patents
25 of the Asserted Patents and/or the “3D Motion Technologies” that CyWee Group Ltd. assigned to
26 CyweeMotion HK Limited in the Patent Assignment and License Agreement entered into on March
27 28, 2016.

1 Your statement on September 10, 2024 that CyWee Group offered to “carry” \$25,000 of
2 costs to be payable upon conclusion of a new lawsuit for patent infringement in exchange for
3 several conditions, including that “Samsung will agree to answer or otherwise respond to the new
4 [CM HK] suit within 45 days of service or November 1, 2024, whichever is later,” including the
5 factual basis for that statement.

6 **TOPIC NO. 7:**

7 Chauncey Shey’s authority to sell, license, assign, or otherwise transfer patents owned by
8 CM HK.

9 **TOPIC NO. 8:**

10 Chauncey Shey’s employment positions in each CyWee Entity and in SBCVC since
11 January 1, 2014.

12 **TOPIC NO. 9:**

13 Shunnan Liou’s employment positions in each CyWee Entity and in SBCVC since
14 January 1, 2014.

15 **TOPIC NO. 10:**

16 Zhou Ye’s employment positions in each CyWee Entity and in SBCVC since January 1,
17 2014.

18 **TOPIC NO. 11:**

19 Tiffany Lin’s employment positions in each CyWee Entity and in SBCVC since January
20 1, 2014.

21 **TOPIC NO. 12:**

22 All efforts by or on behalf of any of the CyWee Entities to sell or offer to sell products
23 that incorporate Motion Sensing Technology.

24 **TOPIC NO. 13:**

25 All efforts by or on behalf of any of the CyWee Entities to license Motion Sensing
26 Technology.

1 **TOPIC NO. 14:**

2 All efforts by or on behalf of any of the CyWee Entities to license and enforce patents
3 owned by any of the CyWee Entities.

4 **TOPIC NO. 15:**

5 The individuals responsible and involved with enforcement of any patent owned by or on
6 behalf of any of the CyWee Entities.

7 **TOPIC NO. 16:**

8 The allocation of any monies received from enforcement or licensing of any patent owned
9 by or on behalf of any of the CyWee Entities.

10 **TOPIC NO. 17:**

11 Any debts incurred from enforcement or licensing of any patent owned by or on behalf of
12 any of the CyWee Entities.

13 **TOPIC NO. 18:**

14 Any agreement in which one or more patents or technologies were licensed to or from one
15 or more of the CyWee Entities.

16 **TOPIC NO. 19:**

17 The transfer and license of the Asserted Patents and any patents in the family of the
18 Asserted Patents.

19 **TOPIC NO. 20:**

20 For each CyWee Entity, the formation, governance, and compliance with local, regional,
21 and national laws.

22 **TOPIC NO. 21:**

23 For each CyWee Entity, the capitalization, cash flow, assets, debt, revenue, profit, the
24 quantity of goods or services sold, and costs since January 1, 2014.

25 **TOPIC NO. 22:**

26 Funding of, ownership of, exercise of control over, transfer of capital to, and donations to
27 any of the CyWee Entities.

1 **TOPIC NO. 23:**

2 Any merger, acquisition, spin-off, restructuring, or other change to the corporate structure
3 that includes any of the CyWee Entities.

4 **TOPIC NO. 24:**

5 For each CyWee Entity, bank account ownership at any point on or after January 1, 2014.

6 **TOPIC NO. 25:**

7 All of the current and former board members, officers, directors, founders, registered
8 agents, and shareholders of each CyWee Entity since January 1, 2014.

9 **TOPIC NO. 26:**

10 All current or former employees, independent contractors, consultants, freelance worker,
11 or agents of each CyWee Entity since January 1, 2014

12 **TOPIC NO. 27:**

13 For each CyWee Entity, meetings in which any board members, directors, executives,
14 officers, investors, shareholders, employees, or other representatives attended since January 1,
15 2014.

16 **TOPIC NO. 28:**

17 For each CyWee Entity, all physical offices owned, leased, rented, or used since January
18 1, 2014.

19 **TOPIC NO. 29:**

20 The operation of each of the CyWee Entities since January 1, 2014.

21 **TOPIC NO. 30:**

22 The company records of each of the CyWee Entities since January 1, 2014.

23 **TOPIC NO. 31:**

24 Contracts and agreements in which any two or more CyWee Entities were parties since
25 January 1, 2014.

1 **TOPIC NO. 32:**

2 All intellectual property assets that any CyWee Entity has had ownership interest in at any
3 time since January 1, 2014.

4 **TOPIC NO. 33:**

5 All assets that any CyWee Entity has had ownership interest in at any time since January
6 1, 2014.

7 **TOPIC NO. 34:**

8 All statements regarding You in the Defendant Declarations submitted in this Action.

9 **TOPIC NO. 35:**

10 Any information contained in Your responses to jurisdictional discovery, Documents
11 produced in response to jurisdictional discovery, or Your statements made to the court, including
12 by declaration.

13 **TOPIC NO. 36:**

14 Any information related to jurisdictional discovery revealed by any Defendant after
15 service of this Notice of Rule 30(b)(6) Deposition, including, *inter alia*, any information or
16 Documents compelled by the Court to be produced or otherwise produced as a result of any
17 discovery disputes.

18 **TOPIC NO. 37:**

19 Statements made regarding personal jurisdiction in connection with Your pending motion
20 to transfer.

21 **TOPIC NO. 38:**

22 Your document retention policies.

23 **TOPIC NO. 39:**

24 The identity and location of documents evidencing or relating to any of the preceding
25 topics.

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TOPIC NO. 40:

The identity and location of documents responsive to discovery requests served in this matter

1 DATED: July 23, 2025

Respectfully submitted,

2 By: /s/ Elizabeth L. Brann

3 ELIZABETH L. BRANN (SB# 222873)

4 elizabethbrann@paulhastings.com

5 ARIELL N. BRATTON (SB# 317587)

6 ariellbratton@paulhastings.com

7 SASHA VUJCIC (SB# 332766)

8 sashavujcic@paulhastings.com

9 PAUL HASTINGS LLP

10 4655 Executive Dr., Suite 350

11 San Diego, CA 92121

12 Telephone: 1(858) 458-3000

13 Facsimile: 1(858) 458-3005

14 Robert Laurenzi (*Pro Hac Vice*)

15 robertlaurenzi@paulhastings.com

16 PAUL HASTINGS LLP

17 200 Park Avenue, 26th Floor

18 New York, NY 10166

19 Telephone: (212) 318-6000

20 Facsimile: (212) 318-6100

21 Attorneys for Plaintiffs

22 Samsung Electronics Co., Ltd. and Samsung

23 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On July 23, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

MICHAEL W SHORE
mshore@shorefirm.com
THE SHORE FIRM LLP
5646 Milton Street, Ste 423
Dallas, TX 75206
Telephone: 1(214) 593-9140
Facsimile: 1(214) 593-9111

CHRISTOPHER L. EVANS
chris@offorevans.com
OFFOR EVANS PLLC
1122 Jackson Street, Ste 901
Dallas, TX 75202
Telephone: 1(214) 394-6779

JAMES L. JACOBS
jjacobs@gcalaw.com
VALERIE MARGO WAGNER
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GCA LAW PARTNERS LLP
2570 W. El Camino Real, Suite 400
Mountain View, CA 94040
Telephone: 1(650) 428-3900
Facsimile: 1(650) 428-3901

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 23, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 11

ELIZABETH L. BRANN (SB# 222873)
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ariellbratton@paulhastings.com
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Facsimile: 1(858) 458-3005

[ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD.,

Defendant.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' NOTICE OF RULE
30(b)(1) DEPOSITION REGARDING
JURISDICTION TO SHUN-NAN LIOU**

DEMAND FOR JURY TRIAL

1 Pursuant to Rule 30(b)(1), PLEASE TAKE NOTICE that, beginning at 9:30 a.m. PDT on
2 July 30, 2025, Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
3 (collectively, “Defendants”), by their undersigned attorneys, will take the remote oral and
4 videotaped deposition of Shun-Nan Liou.

5 The deposition will be reported by a duly authorized court reporter and certified
6 videographer. The deposition will be conducted before an officer authorized to administer oaths
7 and will continue from day-to-day, weekends and legal holidays excluded, until completed, or
8 according to a Court-ordered schedule. The deposition will be taken for the purpose of discovery,
9 for use at trial or any hearing in this matter, and for any other purpose permitted by the Federal
10 Rules of Civil Procedure.

1 DATED: July 23, 2025

Respectfully submitted,

2 By: /s/ Elizabeth L. Brann

3 ELIZABETH L. BRANN (SB# 222873)

4 elizabethbrann@paulhastings.com

5 ARIELL N. BRATTON (SB# 317587)

6 ariellbratton@paulhastings.com

7 SASHA VUJCIC (SB# 332766)

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9 PAUL HASTINGS LLP

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15 robertlaurenzi@paulhastings.com

16 PAUL HASTINGS LLP

17 200 Park Avenue, 26th Floor

18 New York, NY 10166

19 Telephone: (212) 318-6000

20 Facsimile: (212) 318-6100

21 Attorneys for Plaintiffs

22 Samsung Electronics Co., Ltd. and Samsung

23 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On July 23, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

MICHAEL W SHORE
mshore@shorefirm.com
THE SHORE FIRM LLP
5646 Milton Street, Ste 423
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Telephone: 1(650) 428-3900
Facsimile: 1(650) 428-3901

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 23, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 12

From: [Stockstill, Beau](#)
To: [Chris Evans](#); [Vujcic, Sasha](#); [Hunter, Roxanne J.](#); [Michael Shore](#); [Chijioke Offor](#); [jjacobs@gcalaw.com](#); [v.wagner](#); [Jennifer Johnson](#); [cjohnson](#); [Andrew Huffstetler](#); [zdellaporta@shorefirm.com](#)
Cc: [Team Samsung CyWee](#)
Subject: RE: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices
Date: Monday, August 4, 2025 8:47:15 AM
Attachments: [image001.png](#)

Chris,

Thanks. That was the status when we met and conferred on Friday, July 25. Can you please follow up with him if you have not done so already? In addition, as we discussed during the meet and confer, please let us know Dr. Liou's dialect so we can coordinate a translator. Lastly, please let us know when you plan to provide CM HK's 30(b)(6) designations.

-Beau

From: Chris Evans <chris@offorevans.com>
Sent: Thursday, July 31, 2025 10:40 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>; Hunter, Roxanne J. <roxannehunter@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Chijioke Offor <chiji@offorevans.com>; jjacobs@gcalaw.com; v.wagner <vwagner@gcalaw.com>; Jennifer Johnson <jjohnson@gcalaw.com>; cjohnson@shorefirm.com; Andrew Huffstetler <andrew@offorevans.com>; zdellaporta@shorefirm.com
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] Re: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices

--- External Email ---

[Report Suspicious](#)

I've requested dates and I'll let you know when I hear back.

From: Vujcic, Sasha <sashavujcic@paulhastings.com>
Date: Thursday, July 31, 2025 at 1:38 PM
To: Chris Evans <chris@offorevans.com>, Hunter, Roxanne J. <roxannehunter@paulhastings.com>, Michael Shore <mshore@shorefirm.com>, Chijioke Offor <chiji@offorevans.com>, jjacobs@gcalaw.com <jjacobs@gcalaw.com>, v.wagner <vwagner@gcalaw.com>, Jennifer Johnson <jjohnson@gcalaw.com>, cjohnson@shorefirm.com <cjohnson@shorefirm.com>, Andrew Huffstetler <andrew@offorevans.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: RE: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices

Chris

Please provide Dr. Liou's dates of availability for his deposition. We served the deposition notices on July 23 and asked you for Dr. Liou's availability thereafter, including during the July 25 meet and confer.

Thanks,
 Sasha

From: Chris Evans <chris@offorevans.com>
Sent: Thursday, July 24, 2025 10:55 AM
To: Vujcic, Sasha <sashavujcic@paulhastings.com>; Hunter, Roxanne J. <roxannehunter@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Chijioke Offor <chiji@offorevans.com>; jjacobs@gcalaw.com; v.wagner <vwagner@gcalaw.com>; Jennifer Johnson <jjohnson@gcalaw.com>; cjohnson@shorefirm.com; Andrew Huffstetler <andrew@offorevans.com>; zdellaporta@shorefirm.com
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] Re: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices

Sasha,

You should have served deposition notices immediately to secure dates at the end of July. It is not our fault you have not been diligently pursuing discovery. You waited a month to serve your written requests and then waited over two months to serve deposition subpoenas. Do not complain about scheduling that results from your own choices.

We have provided substantive and complete responses to all your discovery requests. Samsung is the one that refused to provide any answers. I understand that you believe we should provide additional information, and we can discuss that further tomorrow. We are in the process of collecting and producing additional documents but I still do not know exactly when that will be completed.

Additionally, we do not represent Mr. Shey or Ms. Lin and neither of them are parties to this case. So you will have to subpoena their depositions if you want them.

Dr. Liou is a CEO and very busy. It is going to be difficult to find time for his deposition. We will do our best to schedule it as quickly as possible.

We can discuss everything at the meet and confer tomorrow.

Sincerely,

Chris Evans

From: Vujcic, Sasha <sashavujcic@paulhastings.com>
Date: Thursday, July 24, 2025 at 1:38 PM
To: Chris Evans <chris@offorevans.com>, Hunter, Roxanne J. <roxannehunter@paulhastings.com>, Michael Shore <mshore@shorefirm.com>, Chijioke Offor <chiji@offorevans.com>, jjacobs@gcalaw.com <jjacobs@gcalaw.com>, v wagner <vwagner@gcalaw.com>, Jennifer Johnson <jjohnson@gcalaw.com>, cjohanson <cjohnson@shorefirm.com>, Andrew Huffstetler <andrew@offorevans.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: RE: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices
 Chris,

You have agreed to the jurisdictional discovery schedule twice now – in our last meet and confer and through preparation of the joint case management statement for the July 29 joint case management conference (which is now postponed to September). The schedule clearly states that the deposition notices were due yesterday and that the deposition window closes two weeks from yesterday. You cannot now excuse your delay with a claim that the schedule is a surprise or “onerous.”

The Court granted Samsung’s request for jurisdictional discovery, and we maintain that the 3 individuals we have noticed for deposition have information relevant to CM HK’s personal jurisdiction. Among the rest, all 3 witnesses have or have had connections to both CyWee Group and CM HK.

You have also not confirmed that you will provide complete responses to our discovery requests, including a complete document production, in advance of the depositions, and we continue to reserve the right to hold the depositions open if those responses and productions are not provided in advance.

Thanks,
 Sasha

From: Chris Evans <chris@offorevans.com>
Sent: Wednesday, July 23, 2025 5:23 PM
To: Hunter, Roxanne J. <roxannehunter@paulhastings.com>; Michael Shore <mshore@shorefirm.com>; Chijioke Offor <chiji@offorevans.com>; jjacobs@gcalaw.com; v wagner <vwagner@gcalaw.com>; Jennifer Johnson <jjohnson@gcalaw.com>; cjohanson <cjohnson@shorefirm.com>; Andrew Huffstetler <andrew@offorevans.com>; zdellaporta@shorefirm.com
Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>
Subject: [EXT] Re: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices

Hunter,

Be prepared to confer about these deposition notices on Friday. Specifically, why the following depositions topics are relevant to anything in this case: 7-17, 20-33 (beyond CM HK), 38-40. And why you need 4 depositions regarding alter ego. This is an unbelievably onerous amount of discovery for a claim that you know will never hold up in court.

Also, it would have been much more efficient if you had served these notices a month or two ago so that we could have secured dates July or August. I doubt we will have many options in August at this point.

It's also unclear why more jurisdictional discovery is necessary since you already told the ED Texas that Samsung *will be filing* an amended complaint. You must have sufficient information to support your alter ego allegations if you've made that determination. Otherwise, I expect you to correct the record in Texas.

Sincerely,

Chris Evans

From: Hunter, Roxanne J. <roxannehunter@paulhastings.com>

Date: Wednesday, July 23, 2025 at 6:07 PM

To: Michael Shore <mshore@shorefirm.com>, Chris Evans <chris@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, jjacobs@gcalaw.com <jjacobs@gcalaw.com>, v wagner <vwagner@gcalaw.com>, Jennifer Johnson <jjohnson@gcalaw.com>, cjohnson <cjohnson@shorefirm.com>, Andrew Huffstetler <andrew@offorevans.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>

Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>

Subject: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST | Deposition Notices Counsel,

Attached please find the following for service:

1. Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.'s ("Samsung") Notice of Deposition Under F.R.C.P. 30(b)(6) of Defendant CM HK, Ltd.;
2. Samsung's Notice of Deposition Under F.R.C.P. 30(b)(1) of Shun-nan Liou;
3. Samsung's Notice of Deposition Under F.R.C.P. 30(b)(1) of Chauncey Shey; and
4. Samsung's Notice of Deposition Under F.R.C.P. 30(b)(1) of Tiffany Lin.

Regards,

Roxy



Roxy Hunter-Descheenie | Paralegal II

Paul Hastings LLP | 4655 Executive Drive, Suite 350, San Diego, CA 92121 | Direct: +1.858.458.2057 | Main: +1.858.458.3000 | Fax: +1.858.458.3005 | roxannehunter@paulhastings.com | www.paulhastings.com

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Exhibit 13

Thursday, August 7, 2025 at 3:38:10 PM Eastern Daylight Time

Subject: Re: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST
Date: Friday, July 25, 2025 at 11:52:39 AM Eastern Daylight Time
From: Chris Evans
To: Vujcic, Sasha, Michael Shore, Chijioke Offor, jjacobs@gcalaw.com, v wagner, Jennifer Johnson, zdellaporta@shorefirm.com, cjohnson, Stockstill, Beau
CC: Team Samsung CyWee
Attachments: image001.png

Beau,

Recap from today's meet and confer. I've agreed to produce CM HK's annual financial reports and board minutes from 2016 – September 2024. I've also agreed to produce CM HK's bank statements from 2016 (or as far back as they still exist) and 2024. And I will confirm that CM HK has not had any other office space, and if so identify it and the time frame CM HK was utilizing it.

We were at an impasse as to whether you can force CM HK to produce documents belonging to other entities that are outside its possession, custody and control. Our understanding is that you will seek to compel us to produce third-party documents and witnesses.

We are also at an impasse you providing substantive responses to CM HK's jurisdictional discovery requests. We will be seeking to compel a response to at least our interrogatory asking you to explain your alter ego theory, including the harm you have allegedly suffered.

During our call, I asked you repeatedly to explain how CM HK was abusing the corporate form and what harm resulted from it. The only answer you provided was that CM HK was abusing the corporate form to avoid jurisdiction in in this case and that the "shell game is an injustice."

I owe you potential dates for a deposition of Dr. Liou and a better estimate of when I will be able to produce the CM HK documents listed above. My goal is to get them produced before August 15th.

Sincerely,

Chris Evans

From: Chris Evans <chris@offorevans.com>

Date: Thursday, July 24, 2025 at 2:33 PM

To: Vujcic, Sasha <sashavujcic@paulhastings.com>, Michael Shore <mshore@shorefirm.com>, Chijioke Offor <chiji@offorevans.com>, jjacobs@gcalaw.com <jjacobs@gcalaw.com>, v wagner <vwagner@gcalaw.com>, Jennifer Johnson <jjohnson@gcalaw.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, cjohnson <cjohnson@shorefirm.com>

Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>

Subject: Re: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST

Sasha,

CM HK has no documents or information in its possession, custody or control other than its own. All of your complaints are about CM HK failing to produce information or documents that are not in its possession custody and control. For example, CM HK does not have financial statements for Cywee Motion Ltd.; CyWee Motion Inc.; CyweeMotion HK Ltd.; CM Investments Inc.

If you want third-party discovery, you will need to subpoena it from them directly.

Sincerely,

Chris Evans

From: Vujcic, Sasha <sashavujcic@paulhastings.com>

Date: Thursday, July 24, 2025 at 2:23 PM

To: Michael Shore <mshore@shorefirm.com>, Chris Evans <chris@offorevans.com>, Chijioke Offor <chiji@offorevans.com>, jjacobs@gcalaw.com <jjacobs@gcalaw.com>, v wagner <vwagner@gcalaw.com>, Jennifer Johnson <jjohnson@gcalaw.com>, zdellaporta@shorefirm.com <zdellaporta@shorefirm.com>, cjohnson <cjohnson@shorefirm.com>

Cc: Team Samsung CyWee <TeamSamsungCyWee@paulhastings.com>

Subject: Samsung Electronics Co, Ltd. et al v. CM HK, Ltd. et al, No. 4:24-cv-06567-JST

Counsel,

Attached please find correspondence from Sasha Vujcic regarding the above referenced matter.

Regards,

Sasha

PAUL
HASTINGS

Sasha Vujcic | Associate

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Exhibit 14

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[Additional Counsel Listed on Signature Page]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD. AND CYWEE GROUP
LTD.,

Defendants.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' FIRST SET OF
JURISDICTIONAL REQUESTS FOR
PRODUCTION OF
DOCUMENTS TO DEFENDANT CM
HK GROUP, LTD. (NOS. 1-25)**

DEMAND FOR JURY TRIAL

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiffs Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (together, "Plaintiffs" or "Samsung") hereby requests that Defendant CM HK, LTD. ("CM HK" or "Defendant") produce the following documents and tangible things that are in their possession, custody or control. The following definitions and instructions apply.

DEFINITIONS

Unless otherwise indicated, the following definitions and terms shall apply to each of the Jurisdictional Requests for Production (“Requests for Production”) set forth below:

1. The term “Asserted Patents” means United States Patent Nos. 10,852,846 (“the ’846 Patent”) and 11,698,687 (“the ’687 Patent”).

2. The terms “Plaintiffs” and “Samsung” shall mean Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc, collectively or individually.

3. The terms “Defendant,” “CM HK,” “You” and/or “Your” shall mean Defendant CM HK, LTD. and any current or former parent subsidiary, affiliated, or related corporation, or any other related entity of the Defendant; all past and present directors, officers, employees, agents, representatives, or persons acting on behalf of any of the foregoing entities; any other person or entity acting on behalf of any of the foregoing entities or on whose behalf any of the foregoing entities have acted; or any other person or entity otherwise subject to the foregoing entities’ control, or to whose control the foregoing entities are subject—in whole or in part.

4. “CyWee Group” means CyWee Group Ltd. and any current or former parent subsidiary, affiliated, or related corporation, or any other related entity of the CyWee Group; all past and present directors, officers, employees, agents, representatives, or persons acting on behalf of any of the foregoing entities; any other person or entity acting on behalf of any of the foregoing entities or on whose behalf any of the foregoing entities have acted; or any other person or entity otherwise subject to the foregoing entities’ control, or to whose control the foregoing entities are subject—in whole or in part.

5. “CyWeeMotion” means CyWeeMotion HK Ltd. and any current or former parent subsidiary, affiliated, or related corporation, or any other related entity of the CyWeeMotion; all past and present directors, officers, employees, agents, representatives, or persons acting on behalf of any of the foregoing entities; any other person or entity acting on behalf of any of the foregoing entities or on whose behalf any of the foregoing entities have acted; or any other person

1 or entity otherwise subject to the foregoing entities' control, or to whose control the foregoing
2 entities are subject—in whole or in part.

3 6. "CyWee Entity" means any of CyWee Group, CyWeeMotion Group Ltd., CyWee
4 Motion Ltd., CyWee Motion Inc., CyWeeMotion, CM Investment Inc., or CM HK.

5 7. "CyWee Entities" means each of CyWee Group, CyWeeMotion Group Ltd.,
6 CyWee Motion Ltd., CyWee Motion Inc., CyWeeMotion, CM Investment Inc., and CM HK.

7 8. The term "Person(s)" means and includes any natural person, corporation,
8 company, proprietorship, partnership, joint venture, association, firm, government entity or any
9 other entity recognized in law, and shall include the owners, officers, directors, agents, trustees,
10 parents, subsidiaries, affiliates, assignees, predecessors, and successors of each such "Person(s)."

11 9. "Document" includes, without limitation, all written, graphic, or otherwise
12 recorded material, including, without limitation, electronically stored information regardless of
13 the form of storage medium, microfilms or other film records or impressions, tape recording or
14 computer cards, floppy disks or printouts, any and all papers, photographs, films, recordings,
15 memoranda, books, records, accounts, communications, letters, telegrams, correspondence, notes
16 of meetings, notes of conversations, notes of telephone calls, interoffice memoranda or written
17 communications of any nature, recordings of conversations either in writing or upon any
18 mechanical or electrical recording devices, including emails, notes, papers, reports, analyses,
19 invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk
20 calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any
21 differing versions of any of the foregoing, whether so denominated, formal, informal, or
22 otherwise, as well as copies of the foregoing that differ in any way, including by the addition of
23 handwritten notations or other written or printed matter of any nature, from the original.

24 10. The term "Communication(s)" shall mean the transmittal of information, in any
25 form, by any means, and includes, without limitation, any transfer of information, ideas, opinions,
26 or thoughts by any means, written, oral, or otherwise, at any time or place under any
27 circumstances, and any Documents incorporating, summarizing or describing the contents of the
28

1 transmission, meetings and discussions, telephone conversations, electronic communications,
2 telegraphic communication or any Document containing a recording, transcription, summary or
3 description or identifying the time, place, subject matter, medium of transmission and/or
4 participants in the transmission. The definition is not limited to transfers between Persons, but
5 also includes other transfers, such as records and memoranda to file; any written letter,
6 memorandum, or other Document that was sent by one or more individuals to another or others;
7 any telephone call between one or more individuals and another or others, whether such call was
8 by chance or prearranged or not, formal or informal; and any conversation or meeting between
9 one or more individuals and another, whether such contact was by chance or prearranged or not,
10 formal or informal.

11 11. “Identify,” “identifying,” “identity,” and “identification” mean and require You to
12 provide:

- 13 a. With respect to a Person, the Person’s name, address, telephone number,
14 employer, and job title, or, if unknown, the Person’s last known address,
15 telephone number, employer, and job title;
- 16 b. With respect to an entity, the entity’s full name, state of incorporation,
17 current or last known business address, and current or last known telephone
18 number;
- 19 c. With respect to a document, the document’s date of creation, author(s),
20 recipient(s), signatory/ies, addressee(s), nature, substance, and/or any other
21 means of identifying the document with sufficient particularity. Documents
22 to be “identified” include documents in Your possession, custody, or
23 control, documents known by You to have existed, but that no longer exist,
24 and other documents of which You have knowledge or information;
- 25 d. With respect to conversations and written or oral communications, the
26 conversation’s or communication’s date of occurrence, location of
27
28

1 occurrence, participants, substance, and the identity of every Person
2 present when the conversation or communication occurred.

3 12. The term “Thing(s)” means and includes any tangible item other than a Document.

4 13. “Concern,” “concerning,” “evidence,” “evidencing,” “reflect,” “reflecting,”
5 “relating to,” “relate to,” “relates to,” “related to,” “referring to,” “refer to,” “refers to,” “referred
6 to,” “regarding,” “refer or relate to,” “referring or relating to,” and “referred or related to” mean
7 in whole or in any part alluding to, responding to, concerning, relating to, connected with,
8 involving, commenting on, in respect of, about, associated with, discussing, evidencing, showing,
9 describing, reflecting, analyzing, summarizing, memorializing, consisting of, constituting,
10 identifying, stating, tending to support, tending to credit or discredit, referring to, or in any way
11 touching upon as the context makes appropriate.

12 14. “Include” and “including” shall mean including without limitation.

13 15. “And” and “or” shall be construed either conjunctively or disjunctively as
14 necessary to bring within the scope of the discovery request all documents that otherwise might
15 be construed to be outside of its scope.

16 16. The words “any,” “all,” “every,” and “each” shall each mean and include the other.

17 17. The use of a verb in any tense shall be construed as the use of the verb in all other
18 tenses.

19 18. Where appropriate, the singular form of a word also includes the plural, and vice
20 versa, to acquire the broadest possible meaning.

21 19. No particular request is meant to limit the scope of any other request, or any term
22 defined, and no such interpretation should be given.

23 20. Plaintiffs’ use of terms, phrases, and definitions is for convenience and shall not be
24 construed as any admission.

25 **INSTRUCTIONS**

26 1. You shall deem these Requests to be continuing, and You shall provide
27 supplemental responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.
28

1 2. You shall answer each Request on the basis of Your entire knowledge from all
2 sources after conducting an appropriate good faith inquiry and search.

3 3. These Requests shall apply to all documents and things in Your actual or
4 constructive possession, custody, or control at the present time, or coming into Your actual or
5 constructive possession, custody, or control during the litigation, including all such responsive
6 documents and things located in the personal files of any and all past or present directors,
7 officers, principals, managers, employees, attorneys, agents, representatives, contractors,
8 consultants, or accountants.

9 4. The documents and/or things requested are to be produced or made available for
10 inspection, examination, and copying at the offices of Paul Hastings LLP, 4655 Executive Drive,
11 Suite 350, San Diego, CA 92121.

12 5. If, in responding to a Request, the responding party encounters any ambiguities
13 when construing a Request or definition, the response shall set forth the matter deemed
14 ambiguous and the construction used in responding.

15 6. If You withhold documents and/or things on the grounds of attorney-client
16 privilege, work product immunity, or any other privilege or immunity, identify the nature of the
17 privilege that You claim, and if the privilege is being asserted in connection with a claim or
18 defense governed by state law, state the privilege rule You invoke. When withholding documents
19 and/or things on the basis of any privilege claim, You must also indicate whether any such
20 information exists.

21 7. When a document contains both privileged and non-privileged material, the non-
22 privileged material must be disclosed to the fullest extent possible without thereby disclosing the
23 privileged material. If a privilege is asserted with regard to part of the material contained in a
24 document, the party claiming the privilege must clearly indicate the portions as to which the
25 privilege is claimed. When a document has been redacted or altered in any fashion, identify as to
26 each document the reason for the redaction or alteration, the date of the redaction or alteration,
27
28

1 and the person performing the redaction or alteration. Any redaction must be clearly visible on
2 the redacted document.

3 8. If You have a good faith objection to any Request or any part thereof, the specific
4 nature of the objection and whether it applies to the entire Request or to a part of the Request
5 shall be stated. If You object to any part of a Request, then You shall identify the part to which
6 You object and respond to the remaining unobjectionable part of the Request.

7 9. All documents requested are to be produced in the same file or other
8 organizational environment in which they are maintained. For example, a document that is part of
9 a file, docket, or other grouping, should be physically produced together with all other documents
10 from said file, docket, or grouping in the same order or manner of arrangement as the original.
11 File folders with tabs or labels identifying documents should be produced intact with such
12 documents.

13 10. If any document that would have been responsive to these requests has been
14 destroyed or is otherwise no longer in Your possession, custody, or control, please provide the
15 following information for each such document: (a) a description of the content of that document;
16 (b) the location of all copies of the document; and (c) the date of, and the identity of the person
17 responsible for, its destruction, loss, transfer, or other action by which the document left Your
18 possession, custody, or control. These requests are ongoing and the responses provided must be
19 supplemented to the extent required by Federal Rule of Civil Procedure 26(e).

20 **REQUESTS FOR PRODUCTION**

21 **REQUEST FOR PRODUCTION NO. 1:**

22 All Documents and Communications relating to Chauncey Shey's authority to sell,
23 license, assign, or otherwise transfer patents owned by CM HK.

24 **REQUEST FOR PRODUCTION NO. 2:**

25 All Documents and Communications relating to the decision to assign the Asserted
26 Patents to CM HK on September 25, 2024.

REQUEST FOR PRODUCTION NO. 3:

All Documents and Communications relating to the decision to assign the “3D motion technologies” from CyWee Group to CyWeeMotion.

REQUEST FOR PRODUCTION NO. 4:

All Documents and Communications relating to Dr. Liou’s statement that “[i]n 2014, CyWee Group approved a spin-off plan of its Motion Business Unit into CyWee Motion Inc. and CyWeeMotion Ltd.”

REQUEST FOR PRODUCTION NO. 5:

Documents and Communications sufficient to show all products that use sensor fusion that CyWee Group sold or licensed or offers or has offered for sale or license after CyWee Group assigned its “3D motion technologies” to CyWeeMotion.

REQUEST FOR PRODUCTION NO. 6:

The “patent assignment agreement referenced” in the Form of Recordable Patent Assignment and Reservation executed on March 1, 2016.

REQUEST FOR PRODUCTION NO. 7:

All Documents and Communications relating to the joint ownership interest in patents that CyWeeMotion and CM HK shared prior to March 29, 2017, according to the Assignment executed on March 29, 2017.

REQUEST FOR PRODUCTION NO. 8:

All Documents and Communications relating to Your statement on June 21, 2024 that “[w]hether CyWee dismisses the case and CM HK, Ltd. sues or CyWee obtains more patents from CM HK, Ltd. to add to the present case is under consideration by others,” including documents and communications showing what those considerations are and what persons or entities were evaluating those considerations.

REQUEST FOR PRODUCTION NO. 9:

All Documents and Communications relating to Your contention on August 5, 2024 that “CyWee [Group] controls or has access to assert” the “patents,” including documents and

1 communications identifying the patents that CyWee Group controls (or controlled) or has (or had)
2 access to assert and the circumstances under which, and the ways in which CyWee Group has or
3 had this control or access to assert these patents.

4 **REQUEST FOR PRODUCTION NO. 10:**

5 All Documents and Communications relating to Your statement on June 20, 2024 that “I
6 spoke to Mr. Shey. He asks that Samsung put in writing what it wants and what it is willing to
7 pay. If it only involves US patents, he can get Samsung an answer in 7-10 days. If the ask
8 involves Chinese patents, it will take 14-30 days, perhaps longer,” including documents and
9 communications identifying the U.S. and Chinese patents, identifying the CyWee Entity that
10 owned those patents on June 20, 2024, explaining how Chauncey Shey would facilitate a
11 purchase of these patents by Samsung, and whether and to what extent Chauncey Shey has or had
12 the authority to sell these patents.

13 **REQUEST FOR PRODUCTION NO. 11:**

14 All Documents and Communications relating to Your statement on May 20, 2024 that
15 “[p]er Mr. Shey, the CM HK Patents are available for purchase with a perpetual, paid-up license
16 back to CM HK, Ltd,” including documents and communications identifying these patents,
17 explaining how Chauncey Shey was knowledgeable on whether the “CM HK Patents are
18 available to purchase,” and whether and to what extent Chauncey Shey has or had the authority to
19 sell, license, assign, or otherwise transfer CM HK’s patents.

20 **REQUEST FOR PRODUCTION NO. 12:**

21 All Documents and Communications relating to Your statement on May 25, 2025 that
22 “[t]he reason CM HK had to file suit was that CyWee [Group] could not negotiate the transfer of
23 the patents to CyWee [Group]. CM HK’s shareholders rejected all CyWee [Group] efforts/offers
24 to obtain the patents.”

25 **REQUEST FOR PRODUCTION NO. 13:**

26 All Documents and Communications relating to Your statement on September 10, 2024
27 that CyWee Group offered to “carry” \$25,000 of costs to be payable upon conclusion of a new
28

lawsuit for patent infringement in exchange for several conditions, including that “Samsung will agree to answer or otherwise respond to the new [CM HK] suit within 45 days of service or November 1, 2024, whichever is later.”

REQUEST FOR PRODUCTION NO. 14:

All Documents and Communications relating to CyWeeMotion’s efforts in response to CyWee Group’s failure to assign the two patents asserted in *CyWee Group Ltd. v. Samsung Elecs. Co.*, No. 2:17-cv-00140-WCB-RSP (E.D. Tex.) to CyWeeMotion three months after dismissal of CyWee Group’s litigation against Apple .

REQUEST FOR PRODUCTION NO. 15:

For each CyWee Entity, all Documents and Communications reflecting the formation, governance, and compliance with local, regional, and national laws, including, without limitation, Articles of Incorporation, Articles of Association, Memoranda of Association, bylaws, policies, resolutions made by the board, original filing documents, annual reports, and filings.

REQUEST FOR PRODUCTION NO. 16:

For Each CyWee Entity, all financial records since January 1, 2014, on a quarterly basis, including income statements, cash flow statements, balance sheets, accounts receivable aging reports, business plans, and budget reports.

REQUEST FOR PRODUCTION NO. 17:

Documents sufficient to show any transfer of funds or other value between any two CyWee Entities from January 1, 2014 to present, including Documents sufficient to show (1) the date of transfer, (2) the amount of the transfer, (3) the identity of the transferor and recipient, and (4) the purpose of the transfer (i.e. dividend, payment for goods, license payment, etc.).

REQUEST FOR PRODUCTION NO. 18:

Documents sufficient to identify all Persons who have, since January 1, 2014, invested in, owned any portion of, exercised any control over, provided capital to or for, donated or provided gifts to, or otherwise transferred money or other capital (other than in exchange for products or services) to each of the CyWee Entities.

REQUEST FOR PRODUCTION NO. 19:

Documents sufficient to show current and former ownership of each bank account for each CyWee Entity since January 1, 2014.

REQUEST FOR PRODUCTION NO. 20:

Documents sufficient to show, since January 1, 2014, all of the current and former directors, founders, registered agents, and shareholders, of each CyWee Entity, including Documents sufficient to show (1) the individual's title for the CyWee Entity; (2) the dates the individual held that title for the CyWee Entity; and (3) the individual's office or other working location(s) for the CyWee Entity.

REQUEST FOR PRODUCTION NO. 21:

Documents sufficient to show, since January 1, 2014, all of the current and former employees, independent contractors, consultants, freelance workers, and other individuals performing any work or services for any CyWee Entity, including Documents sufficient to show (1) the individual's title, role, and responsibilities for the CyWee Entity; (2) the dates the individual was engaged, employed, or otherwise performed any work or services for the CyWee Entity; and (3) the individual's office or other working location(s) while performing work or services for the CyWee Entity.

REQUEST FOR PRODUCTION NO. 22:

For each CyWee Entity, all minutes and meeting materials for any meetings of in which directors, executives, officers, investors, shareholders, employees, or other representatives attended since January 1, 2014.

REQUEST FOR PRODUCTION NO. 23:

For each CyWee Entity, for all of current and former physical offices (or other physical spaces from which business is or was conducted) and/or mailing addresses since January 1, 2014, Documents sufficient to show (1) the mailing address(es) of such offices, (2) if rented, all current and former lease agreements for such offices, (3) if owned, the purchaser, date of purchase, and the connection of the purchaser to the CyWee Entity for such offices and/or real estate, (4) if not

1 owned or rented, the CyWee Entity's rights in the offices and/or real estate and/or right to occupy
2 the premises at such offices, and (5) the Person that pays rent, property taxes, utilities, mortgage,
3 and property or rental insurance for such offices and/or real estate.

4 **REQUEST FOR PRODUCTION NO. 24:**

5 All contracts, agreements, including profit-transfer agreements (or similar agreements
6 governing how expenses and/or revenue are allocated), statements of work, invoices, or
7 memorandums of understanding between any two CyWee Entities since January 1, 2014.

8 **REQUEST FOR PRODUCTION NO. 25:**

9 For each CyWee Entity, documents sufficient to identify all assets that the CyWee Entity
10 had ownership interest in, including identifying nature of the ownership interest and the dates that
11 the CyWee Entity possessed this ownership interest.

12 **REQUEST FOR PRODUCTION NO. 26:**

13 All Documents and Communications relating to the relationship between Shun-Nan Liou
14 and CyWee Group, including but not limited to Shun-Nan Liou's employment with CyWee
15 Group.

16 **REQUEST FOR PRODUCTION NO. 27:**

17 All Documents and Communications relating to restructuring CyWeeMotion Ltd. by
18 incorporating CyWeeMotion Group Ltd.

1 DATED: June 9, 2025

PAUL HASTINGS LLP

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19 *Attorneys for Plaintiffs*
20 *Samsung Electronics Co., Ltd. and*
21 *Samsung Electronics America, Inc.*
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On June 9, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

MICHAEL W SHORE
mshore@shorefirm.com
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2570 W. El Camino Real, Suite 400
Mountain View, CA 94040
Telephone: 1(650) 428-3900
Facsimile: 1(650) 428-3901

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 9, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 15

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[Additional Counsel Listed on Signature Page]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD. AND CYWEE GROUP
LTD.,

Defendants.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' FIRST SET OF
JURISDICTIONAL REQUESTS FOR
ADMISSION TO DEFENDANT CM HK,
LTD. (NOS. 1-13)**

DEMAND FOR JURY TRIAL

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., (collectively, "Plaintiffs" or "Samsung") by and through their undersigned counsel, propound this First Set of Jurisdictional Requests for Admission ("Requests for Admission") to CM HK, Ltd. ("Defendant" and/or "CM HK") and request that Defendant respond to the following Requests for Admission in writing, under oath, and in accordance with the following instructions and definitions, within 30 days from the date of service thereof. Defendant shall supplement all responses to these Requests for Admission as required by the Federal Rules of Civil Procedure.

DEFINITIONS

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3 1. The term “Asserted Patents” means United States Patent Nos. 10,852,846 (“the
4 ’846 Patent”) and 11,698,687 (“the ’687 Patent”).

5 2. “CM HK,” “Defendant,” “You,” and “Your” mean CM HK, Ltd. and its officers,
6 directors, current and former employees, counsel, agents, consultants, representatives, and any
7 other persons acting on behalf of any of the foregoing, and CM HK’s affiliates, parents, divisions,
8 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
9 other legal entities, whether foreign or domestic, that are owned or controlled by CM HK, and all
10 predecessors and successors in interest to such entities or to the Asserted Patents, including but
11 not limited to CM HK.

12 3. “CyWee Group” means CyWee Group Ltd. and its officers, directors, current and
13 former employees, counsel, agents, consultants, representatives, and any other persons acting on
14 behalf of any of the foregoing, and CyWee Group’s affiliates, parents, divisions, joint ventures,
15 licensees, franchisees, assigns, predecessors and successors in interest, and any other legal
16 entities, whether foreign or domestic, that are owned or controlled by CyWee Group, and all
17 predecessors and successors in interest to such entities or to the Asserted Patents, including but
18 not limited to CyWee Group.

19 4. “CyWeeMotion” means CyWeeMotion HK Ltd. and its officers, directors, current
20 and former employees, counsel, agents, consultants, representatives, and any other persons acting
21 on behalf of any of the foregoing, and CyWeeMotion’s affiliates, parents, divisions, joint
22 ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other
23 legal entities, whether foreign or domestic, that are owned or controlled by CyWeeMotion, and all
24 predecessors and successors in interest to such entities or to the Asserted Patents, including but
25 not limited to CyWeeMotion
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1 5. “Person” refers to any individual, corporation, proprietorship, association, joint
2 venture, company, partnership, or other business or legal entity, including governmental bodies
3 and agencies.

4 6. “SBCVC” means Softbank China Venture Capital Co. Ltd and its officers,
5 directors, current and former employees, counsel, agents, consultants, representatives, and any
6 other persons acting on behalf of any of the foregoing, and SBCVC’s affiliates, parents, divisions,
7 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
8 other legal entities, whether foreign or domestic, that are owned or controlled by SBCVC, and all
9 predecessors and successors in interest to such entities or to the Asserted Patents, including but
10 not limited to SBCVC.

11 7. “Document” includes, without limitation, all written, graphic, or otherwise
12 recorded material, including, without limitation, electronically stored information regardless of
13 the form of storage medium, microfilms or other film records or impressions, tape recordings or
14 computer cards, floppy disks or printouts, any and all papers, photographs, films, recordings,
15 memoranda, books, records, accounts, communications, letters, telegrams, correspondence, notes
16 of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written
17 communications of any nature, recordings of conversations either in writing or upon any
18 mechanical or electrical recording devices, including e-mails, notes, papers, reports, analyses,
19 invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk
20 calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any
21 differing versions of any of the foregoing, whether so denominated, formal, informal, or
22 otherwise, as well as copies of the foregoing that differ in any way, including by the addition of
23 handwritten notations or other written or printed matter of any nature, from the original.

24 8. “Communication” means, without limitation, any transmission, conveyance, or
25 exchange of a word, statement, fact, thing, idea, document, instruction, information, demand, or
26 question by any medium, whether by written, oral, or other means, including electronic
27 communications and electronic mail.
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1 9. “Identify,” “identifying,” “identity,” and “identification” mean and require You to
2 provide:

3 (a) With respect to a person, the person’s name, address, telephone number, employer,
4 and job title, or, if unknown, the person’s last known address, telephone number, employer, and
5 job title;

6 (b) With respect to an entity, the entity’s full name, state of incorporation, current or
7 last known business address, and current or last known telephone number;

8 (c) With respect to a document, the document’s date of creation, author(s),
9 recipient(s), signatory/ies, addressee(s), nature, substance, and/or any other means of identifying
10 the document with sufficient particularity. Documents to be “identified” include documents in
11 Your possession, custody, or control, documents known by You to have existed, but that no
12 longer exist, and other documents of which You have knowledge or information;

13 (d) With respect to conversations and written or oral communications, the
14 conversation’s or communication’s date of occurrence, location of occurrence, participants,
15 substance, and the identity of every person present when the conversation or communication
16 occurred.

17 10. “Concern,” “concerning,” “evidence,” “evidencing,” “reflect,” “reflecting,”
18 “relating to,” “relate to,” “relates to,” “related to,” “referring to,” “refer to,” “refers to,” “referred
19 to,” “regarding,” “refer or relate to,” “referring or relating to,” and “referred or related to” mean
20 in whole or in any part alluding to, responding to, concerning, relating to, connected with,
21 involving, commenting on, in respect of, about, associated with, discussing, evidencing, showing,
22 describing, reflecting, analyzing, summarizing, memorializing, consisting of, constituting,
23 identifying, stating, tending to support, tending to credit or discredit, referring to, or in any way
24 touching upon as the context makes appropriate.

25 11. “Include” and “including” shall mean including without limitation.
26
27
28

12. “And” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all documents that otherwise might be construed to be outside of its scope.

13. The words “any,” “all,” “every,” and “each” shall each mean and include the other.

14. The use of a verb in any tense shall be construed as the use of the verb in all other tenses.

15. Where appropriate, the singular form of a word also includes the plural, and vice versa, to acquire the broadest possible meaning.

16. No particular Request for Admission is meant to limit the scope of any other Request for Admission, or any term defined, and no such interpretation should be given.

17. Samsung’s use of terms, phrases, and definitions is for convenience and shall not be construed as an admission.

INSTRUCTIONS

For purposes of these Requests for Admission, the following instructions apply:

1. These instructions and definitions should be construed to require answers based upon the knowledge of, and information available to, the responding party as well as its agents, representatives, and attorneys.

2. These requests for admission are continuing in nature, so as to require that supplemental answers be served promptly if further or different information is obtained with respect to any request.

3. Each answer must be as complete and straightforward as the information reasonably available to You permits. If a Request cannot be admitted completely, then it should be admitted to the fullest extent possible. You shall use common sense and reason in Your responses. Hyper-technical or evasive objections are not permitted under the Federal Rules of Civil Procedure.

1 4. No part of an admission should be left unanswered merely because an objection is
2 interposed to another part of the request. If a partial or incomplete answer is provided, Plaintiff
3 shall state that the answer is partial or incomplete.

4 5. If, in responding to these requests for admission, Plaintiff contends that an
5 ambiguity exists with respect to construing a request or definition, the response shall set forth the
6 matter deemed ambiguous and the construction used in responding.

7 **REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that SBCVC has an ownership interest in CM HK.

10 **REQUEST FOR ADMISSION NO. 2:**

11 Admit that Chauncey Shey currently or previously has been employed as an executive,
12 director, or Chairman for SBCVC.

13 **REQUEST FOR ADMISSION NO. 3:**

14 Admit that Chauncey Shey currently or previously has been employed as an executive,
15 director, or Chairman for CyWee Group.

16 **REQUEST FOR ADMISSION NO. 4:**

17 Admit that Chauncey Shey currently or previously has been employed as an executive,
18 director, or Chairman for CyWeeMotion HK Limited.

19 **REQUEST FOR ADMISSION NO. 5:**

20 Admit that CyWee Group started as a joint venture between Taiwan's Industrial
21 Technology Research Institute (ITRA) and SBCVC.

22 **REQUEST FOR ADMISSION NO. 6:**

23 Admit that CyWeeMotion Group Ltd. was founded by individuals from Taiwan's
24 Industrial Technology Research Institute (ITRA).

25 **REQUEST FOR ADMISSION NO. 7:**

26 Admit that CyWeeMotion HK Limited was founded by individuals from Taiwan's
27 Industrial Technology Research Institute (ITRA).
28

REQUEST FOR ADMISSION NO. 8:

Admit that CyWee Group and CyWeeMotion Group Ltd. each had an office located at Room 1708, Building A, Gemdale Plaza, No.91, Jianguo Road Chaoyang District, Beijing, China, 100022.

REQUEST FOR ADMISSION NO. 9:

Admit that CyWee Group and CyWeeMotion HK Limited executed an agreement on March 28, 2016 for CyWee Group to assign patents to CyWee Motion HK Limited “free of charge.”

REQUEST FOR ADMISSION NO. 10:

Admit that CyWee Group did not assign U.S. Patent Nos. 8,441,438 and 8,552,978 to CyWee Motion Group Ltd. three months after CyWee Group’s litigation against Apple was settled.

REQUEST FOR ADMISSION NO. 11:

Admit that CyWee Group has not sued CyWeeMotion HK Limited for breach of contract.

REQUEST FOR ADMISSION NO. 12:

Admit that CyWeeMotion HK Limited assigned the patents listed at CMHK_SAMSUNG0009741–42 in exchange for “ten dollars and good and valuable consideration.”

REQUEST FOR ADMISSION NO. 13:

Admit that Shunnan Liou was a director of CM HK Limited and CyWeeMotion HK Limited as of September 25, 2024.

1 DATED: June 9, 2025

PAUL HASTINGS LLP

2 By: /s/ Elizabeth L. Brann

3 ELIZABETH L. BRANN (SB# 222873)

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19 Attorneys for Plaintiffs

20 Samsung Electronics Co., Ltd. and Samsung

21 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On June 9, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 9, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 16

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[Additional Counsel Listed on Signature Page]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Plaintiffs,

vs.

CM HK, LTD. AND CYWEE GROUP
LTD.,

Defendants.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' FIRST SET OF
JURISDICTIONAL
INTERROGATORIES TO DEFENDANT
CM HK, LTD. (NOS. 1-18)**

DEMAND FOR JURY TRIAL

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., (collectively, "Plaintiffs" or "Samsung") by and through their undersigned counsel, propound this First Set of Jurisdictional Interrogatories ("Interrogatories") to CM HK, Ltd. ("Defendant" and/or "CM HK") and request that Defendant respond to the following Interrogatories in writing, under oath, and in accordance with the following instructions and definitions, within 30 days from the date of service thereof. Defendant shall supplement all responses to these Interrogatories as required by the Federal Rules of Civil Procedure.

DEFINITIONS

1
2
3 1. The term “Asserted Patents” means United States Patent Nos. 10,852,846 (“the
4 ’846 Patent”) and 11,698,687 (“the ’687 Patent”).

5 2. “CM HK,” “Defendant,” “You,” and “Your” mean CM HK, Ltd. and its officers,
6 directors, current and former employees, counsel, agents, consultants, representatives, and any
7 other persons acting on behalf of any of the foregoing, and CM HK’s affiliates, parents, divisions,
8 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
9 other legal entities, whether foreign or domestic, that are owned or controlled by CM HK, and all
10 predecessors and successors in interest to such entities or to the Asserted Patents, including but
11 not limited to CM HK.

12 3. “CyWee Group” means CyWee Group Ltd. and its officers, directors, current and
13 former employees, counsel, agents, consultants, representatives, and any other persons acting on
14 behalf of any of the foregoing, and CyWee Group’s affiliates, parents, divisions, joint ventures,
15 licensees, franchisees, assigns, predecessors and successors in interest, and any other legal
16 entities, whether foreign or domestic, that are owned or controlled by CyWee Group, and all
17 predecessors and successors in interest to such entities or to the Asserted Patents, including but
18 not limited to CyWee Group.

19 4. “CyWeeMotion” means CyWeeMotion HK Ltd. and its officers, directors, current
20 and former employees, counsel, agents, consultants, representatives, and any other persons acting
21 on behalf of any of the foregoing, and CyWeeMotion’s affiliates, parents, divisions, joint
22 ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other
23 legal entities, whether foreign or domestic, that are owned or controlled by CyWeeMotion, and all
24 predecessors and successors in interest to such entities or to the Asserted Patents, including but
25 not limited to CyWeeMotion

26 5. “CyWee Entity” means any of CyWee Group, CyWeeMotion Group Ltd., CyWee
27 Motion Ltd., CyWee Motion Inc., CyWeeMotion, CM Investment Inc., or CM HK.
28

1 6. “CyWee Entities” means each of CyWee Group, CyWeeMotion Group Ltd.,
2 CyWee Motion Ltd., CyWee Motion Inc., CyWeeMotion, CM Investment Inc., and CM HK.

3 7. “Plaintiffs” and “Samsung” refer to Samsung Electronics Co., Ltd. and Samsung
4 Electronics America, Inc.

5 8. “Person” refers to any individual, corporation, proprietorship, association, joint
6 venture, company, partnership, or other business or legal entity, including governmental bodies
7 and agencies.

8 9. “SBCVC” means Softbank China Venture Capital Co. Ltd and its officers,
9 directors, current and former employees, counsel, agents, consultants, representatives, and any
10 other persons acting on behalf of any of the foregoing, and SBCVC’s affiliates, parents, divisions,
11 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
12 other legal entities, whether foreign or domestic, that are owned or controlled by SBCVC, and all
13 predecessors and successors in interest to such entities or to the Asserted Patents, including but
14 not limited to SBCVC.

15 10. “Document” includes, without limitation, all written, graphic, or otherwise
16 recorded material, including, without limitation, electronically stored information regardless of
17 the form of storage medium, microfilms or other film records or impressions, tape recordings or
18 computer cards, floppy disks or printouts, any and all papers, photographs, films, recordings,
19 memoranda, books, records, accounts, communications, letters, telegrams, correspondence, notes
20 of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written
21 communications of any nature, recordings of conversations either in writing or upon any
22 mechanical or electrical recording devices, including e-mails, notes, papers, reports, analyses,
23 invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk
24 calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any
25 differing versions of any of the foregoing, whether so denominated, formal, informal, or
26 otherwise, as well as copies of the foregoing that differ in any way, including by the addition of
27 handwritten notations or other written or printed matter of any nature, from the original.
28

1 11. “Communication” means, without limitation, any transmission, conveyance, or
2 exchange of a word, statement, fact, thing, idea, document, instruction, information, demand, or
3 question by any medium, whether by written, oral, or other means, including electronic
4 communications and electronic mail.

5 12. “Identify,” “identifying,” “identity,” and “identification” mean and require You to
6 provide:

7 (a) With respect to a person, the person’s name, address, telephone number, employer,
8 and job title, or, if unknown, the person’s last known address, telephone number, employer, and
9 job title;

10 (b) With respect to an entity, the entity’s full name, state of incorporation, current or
11 last known business address, and current or last known telephone number;

12 (c) With respect to a document, the document’s date of creation, author(s),
13 recipient(s), signatory/ies, addressee(s), nature, substance, and/or any other means of identifying
14 the document with sufficient particularity. Documents to be “identified” include documents in
15 Your possession, custody, or control, documents known by You to have existed, but that no
16 longer exist, and other documents of which You have knowledge or information;

17 (d) With respect to conversations and written or oral communications, the
18 conversation’s or communication’s date of occurrence, location of occurrence, participants,
19 substance, and the identity of every person present when the conversation or communication
20 occurred.

21 13. “Concern,” “concerning,” “evidence,” “evidencing,” “reflect,” “reflecting,”
22 “relating to,” “relate to,” “relates to,” “related to,” “referring to,” “refer to,” “refers to,” “referred
23 to,” “regarding,” “refer or relate to,” “referring or relating to,” and “referred or related to” mean
24 in whole or in any part alluding to, responding to, concerning, relating to, connected with,
25 involving, commenting on, in respect of, about, associated with, discussing, evidencing, showing,
26 describing, reflecting, analyzing, summarizing, memorializing, consisting of, constituting,
27 identifying, stating, tending to support, tending to credit or discredit, referring to, or in any way
28 touching upon as the context makes appropriate.

14. “Include” and “including” shall mean including without limitation.

15. “And” and “or” shall be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all documents that otherwise might be construed to be outside of its scope.

16. The words “any,” “all,” “every,” and “each” shall each mean and include the other.

17. The use of a verb in any tense shall be construed as the use of the verb in all other tenses.

18. Where appropriate, the singular form of a word also includes the plural, and vice versa, to acquire the broadest possible meaning.

19. No particular Interrogatory is meant to limit the scope of any other Interrogatory, or any term defined, and no such interpretation should be given.

20. Samsung’s use of terms, phrases, and definitions is for convenience and shall not be construed as an admission.

INSTRUCTIONS

For purposes of these Interrogatories, the following instructions apply:

1. In answering the following Interrogatories, You are required to provide all information that is available to You or within Your control, including information in the possession, custody, or control of any of Your attorneys, directors, officers, agents, employees, representatives associates, investigators, division affiliates, partnerships, parents, subsidiaries, and persons under Your control, who have the best knowledge, not merely information from Your personal knowledge.

2. If, in answering any Interrogatory, You encounter any ambiguity concerning either the Interrogatory or the definition or instruction relevant to the inquiry contained within the Interrogatory, set forth the matter deemed ambiguous and the construction selected for use in answering the Interrogatory.

3. If You contend that You are entitled to refuse to respond, in whole or in part, to any Interrogatory on the basis of any privilege or other ground, please state the complete factual and legal basis supporting Your assertion of privilege or other ground for refusing to respond.

1 4. You are obligated to respond to these Interrogatories to the full extent required by
2 the Federal Rules of Civil Procedure.

3 5. These Interrogatories are continuing in nature and, as such, You are under a duty
4 to supplement Your responses as required by Rule 26(e) of the Federal Rules of Civil Procedure.

5 **INTERROGATORIES**

6 **INTERROGATORY NO. 1:**

7 Describe in detail the complete factual basis for Your statement on June 21, 2024 that
8 “[w]hether CyWee dismisses the case and CM HK, Ltd. sues or CyWee obtains more patents from
9 CM HK, Ltd. to add to the present case is under consideration by others,” including what those
10 considerations are and what persons or entities were evaluating those considerations.

11 **INTERROGATORY NO. 2:**

12 Describe in detail the complete factual basis for Your contention on August 5, 2024 that
13 “CyWee [Group] controls or has access to assert” the “patents,” including identifying the patents
14 that CyWee Group controls (or controlled) or has (or had) access to assert and the circumstances
15 under which, and the ways in which CyWee Group has or had this control or access to assert these
16 patents.

17 **INTERROGATORY NO. 3:**

18 Describe in detail the complete factual basis for Your statement on June 20, 2024 that “I
19 spoke to Mr. Shey. He asks that Samsung put in writing what it wants and what it is willing to pay.
20 If it only involves US patents, he can get Samsung an answer in 7-10 days. If the ask involves
21 Chinese patents, it will take 14-30 days, perhaps longer,” including identifying the U.S. and
22 Chinese patents, identifying the CyWee Entity that owned those patents on June 20, 2024,
23 explaining how Mr. Shey would facilitate a purchase of these patents by Samsung, and whether
24 and to what extent Mr. Shey has or had the authority to sell these patents.

25 **INTERROGATORY NO. 4:**

26 Describe in detail the complete factual basis for Your statement on May 20, 2024 that “[p]er
27 Mr. Shey, the CM HK Patents are available for purchase with a perpetual, paid-up license back to
28 CM HK, Ltd,” including identifying these patents, explaining how Mr. Shey was knowledgeable

1 on whether the “CM HK Patents are available to purchase,” and whether and to what extent Mr.
2 Shey has or had the authority to sell, license, assign, or otherwise transfer CM HK’s patents.

3 **INTERROGATORY NO. 5:**

4 Describe in detail the complete factual basis for Your statement on May 25, 2025 that “[t]he
5 reason CM HK had to file suit was that CyWee [Group] could not negotiate the transfer of the
6 patents to CyWee [Group]. CM HK’s shareholders rejected all CyWee [Group] efforts/offers to
7 obtain the patents.”

8 **INTERROGATORY NO. 6:**

9 Describe in detail the complete factual basis for Your statement on September 10, 2024 that
10 CyWee Group offered to “carry” \$25,000 of costs to be payable upon conclusion of a new lawsuit
11 for patent infringement in exchange for several conditions, including that “Samsung will agree to
12 answer or otherwise respond to the new [CM HK] suit within 45 days of service or November 1,
13 2024, whichever is later.”

14 **INTERROGATORY NO. 7:**

15 Identify Chauncey Shey and Shunnan Liou’s employment positions in each CyWee Entity
16 and in SBCVC since January 1, 2014, including identifying the dates of each held such positions
17 or roles.

18 **INTERROGATORY NO. 8:**

19 Describe in detail the circumstances under which CyWee Group, CyWeeMotion, and CM
20 HK executed the Patent Assignment on September 25, 2024 (“the September 25, 2024
21 Assignment”), including the purpose of the September 25, 2024 Assignment and which CyWee
22 Entity You contend owned the patents listed in Annex A of the September 25, 2024 Assignment
23 (including the Asserted Patents) immediately prior to the September 25, 2024 Assignment being
24 executed.

25 **INTERROGATORY NO. 9:**

26 Describe in detail CyWeeMotion’s efforts in response to CyWee Group’s failure to assign
27 the two patents asserted in *CyWee Group Ltd. v. Samsung Elecs. Co.*, No. 2:17-cv-00140-WCB-
28 RSP (E.D. Tex.) to CyWeeMotion three months after dismissal of CyWee Group’s litigation against

1 Apple as provided by the March 28, 2016 Patent Assignment and License Agreement between
2 CyWee Group and CyWeeMotion.

3 **INTERROGATORY NO. 10:**

4 Identify, separately for each CyWee Entity, the revenue, the quantity of goods or services
5 sold, and costs on a quarterly basis since January 1, 2014.

6 **INTERROGATORY NO. 11:**

7 Identify all Persons who have, since January 1, 2014, invested in, owned any portion of,
8 exercised any control over, provided capital to or for, donated or provided gifts to, or otherwise
9 transferred money or other capital (other than in exchange for products or services) to any of the
10 CyWee Entities, including identifying the CyWee Entity to whom the money or other capital was
11 transferred and identifying the amounts and types of investment, capital, gifts, or money provided
12 by each Person.

13 **INTERROGATORY NO. 12:**

14 Identify any Persons who have (or had at any time since January 1, 2014) ownership,
15 shareholding, or legal or management control in a CyWee Entity, including identifying the CyWee
16 Entity it has ownership, shareholding, or legal or management control in, describing the nature of
17 that ownership or control, and identifying its ownership percentage in that CyWee Entity.

18 **INTERROGATORY NO. 13:**

19 For each CyWee Entity, identify each bank account owned by that CyWee Entity at any
20 point on or after January 1, 2014. The identification should include (a) the address of the bank at
21 which the account is maintained, and (b) purpose of the bank account.

22 **INTERROGATORY NO. 14:**

23 Identify all of the current and former officers, directors, founders, registered agents, and
24 shareholders of each CyWee Entity since January 1, 2014, including identifying the individual's
25 title in the CyWee Entity and the dates of each held such title.

26 **INTERROGATORY NO. 15:**

27 Identify all meetings of the directors, executives, officers, investors, shareholders,
28 employees, or other representatives of each CyWee Entity since January 1, 2014, including

1 identifying each participating individual's title in the CyWee Entity and the dates each held such
2 title.

3 **INTERROGATORY NO. 16:**

4 Identify all current or former employees, independent contractors, consultants, freelance
5 worker, or agents of each CyWee Entity since January 1, 2014.

6 **INTERROGATORY NO. 17:**

7 For each CyWee Entity, identify all of the physical offices since January 1, 2014,
8 including identifying the dates the CyWee Entity occupied and/or otherwise used those offices
9 and describing the nature of the CyWee Entity's operations conducted at those offices.

10 **INTERROGATORY NO. 18:**

11 For each CyWee Entity, identify all assets that the CyWee Entity had ownership interest
12 in, including identifying nature of the ownership interest and the dates that the CyWee Entity
13 possessed this ownership interest.

1 DATED: June 9, 2025

PAUL HASTINGS LLP

2 By: /s/ Elizabeth L. Brann

3 ELIZABETH L. BRANN (SB# 222873)

4 elizabethbrann@paulhastings.com

5 ARIELL N. BRATTON (SB# 317587)

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13 ROBERT LAURENZI (*Pro Hac Vice*)

14 robertlaurenzi@paulhastings.com

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16 New York, NY 10166

17 Telephone: (212) 318-6000

18 Facsimile: (212) 318-6100

19 Attorneys for Plaintiffs

20 Samsung Electronics Co., Ltd. and Samsung

21 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On June 9, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

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Mountain View, CA 94040
Telephone: 1(650) 428-3900
Facsimile: 1(650) 428-3901

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 9, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 16

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[Additional Counsel Listed on Signature Page]

Attorneys for Plaintiffs
Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
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SAMSUNG ELECTRONICS CO., LTD.
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Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., (collectively, "Plaintiffs" or "Samsung") by and through their undersigned counsel, propound this First Set of Jurisdictional Interrogatories ("Interrogatories") to CM HK, Ltd. ("Defendant" and/or "CM HK") and request that Defendant respond to the following Interrogatories in writing, under oath, and in accordance with the following instructions and definitions, within 30 days from the date of service thereof. Defendant shall supplement all responses to these Interrogatories as required by the Federal Rules of Civil Procedure.

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3 1. The term “Asserted Patents” means United States Patent Nos. 10,852,846 (“the
4 ’846 Patent”) and 11,698,687 (“the ’687 Patent”).

5 2. “CM HK,” “Defendant,” “You,” and “Your” mean CM HK, Ltd. and its officers,
6 directors, current and former employees, counsel, agents, consultants, representatives, and any
7 other persons acting on behalf of any of the foregoing, and CM HK’s affiliates, parents, divisions,
8 joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any
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10 predecessors and successors in interest to such entities or to the Asserted Patents, including but
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12 3. “CyWee Group” means CyWee Group Ltd. and its officers, directors, current and
13 former employees, counsel, agents, consultants, representatives, and any other persons acting on
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17 predecessors and successors in interest to such entities or to the Asserted Patents, including but
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26 otherwise, as well as copies of the foregoing that differ in any way, including by the addition of
27 handwritten notations or other written or printed matter of any nature, from the original.
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1 11. “Communication” means, without limitation, any transmission, conveyance, or
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4 communications and electronic mail.

5 12. “Identify,” “identifying,” “identity,” and “identification” mean and require You to
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7 (a) With respect to a person, the person’s name, address, telephone number, employer,
8 and job title, or, if unknown, the person’s last known address, telephone number, employer, and
9 job title;

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11 last known business address, and current or last known telephone number;

12 (c) With respect to a document, the document’s date of creation, author(s),
13 recipient(s), signatory/ies, addressee(s), nature, substance, and/or any other means of identifying
14 the document with sufficient particularity. Documents to be “identified” include documents in
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8 “[w]hether CyWee dismisses the case and CM HK, Ltd. sues or CyWee obtains more patents from
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10 considerations are and what persons or entities were evaluating those considerations.

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13 “CyWee [Group] controls or has access to assert” the “patents,” including identifying the patents
14 that CyWee Group controls (or controlled) or has (or had) access to assert and the circumstances
15 under which, and the ways in which CyWee Group has or had this control or access to assert these
16 patents.

17 **INTERROGATORY NO. 3:**

18 Describe in detail the complete factual basis for Your statement on June 20, 2024 that “I
19 spoke to Mr. Shey. He asks that Samsung put in writing what it wants and what it is willing to pay.
20 If it only involves US patents, he can get Samsung an answer in 7-10 days. If the ask involves
21 Chinese patents, it will take 14-30 days, perhaps longer,” including identifying the U.S. and
22 Chinese patents, identifying the CyWee Entity that owned those patents on June 20, 2024,
23 explaining how Mr. Shey would facilitate a purchase of these patents by Samsung, and whether
24 and to what extent Mr. Shey has or had the authority to sell these patents.

25 **INTERROGATORY NO. 4:**

26 Describe in detail the complete factual basis for Your statement on May 20, 2024 that “[p]er
27 Mr. Shey, the CM HK Patents are available for purchase with a perpetual, paid-up license back to
28 CM HK, Ltd,” including identifying these patents, explaining how Mr. Shey was knowledgeable

1 on whether the “CM HK Patents are available to purchase,” and whether and to what extent Mr.
2 Shey has or had the authority to sell, license, assign, or otherwise transfer CM HK’s patents.

3 **INTERROGATORY NO. 5:**

4 Describe in detail the complete factual basis for Your statement on May 25, 2025 that “[t]he
5 reason CM HK had to file suit was that CyWee [Group] could not negotiate the transfer of the
6 patents to CyWee [Group]. CM HK’s shareholders rejected all CyWee [Group] efforts/offers to
7 obtain the patents.”

8 **INTERROGATORY NO. 6:**

9 Describe in detail the complete factual basis for Your statement on September 10, 2024 that
10 CyWee Group offered to “carry” \$25,000 of costs to be payable upon conclusion of a new lawsuit
11 for patent infringement in exchange for several conditions, including that “Samsung will agree to
12 answer or otherwise respond to the new [CM HK] suit within 45 days of service or November 1,
13 2024, whichever is later.”

14 **INTERROGATORY NO. 7:**

15 Identify Chauncey Shey and Shunnan Liou’s employment positions in each CyWee Entity
16 and in SBCVC since January 1, 2014, including identifying the dates of each held such positions
17 or roles.

18 **INTERROGATORY NO. 8:**

19 Describe in detail the circumstances under which CyWee Group, CyWeeMotion, and CM
20 HK executed the Patent Assignment on September 25, 2024 (“the September 25, 2024
21 Assignment”), including the purpose of the September 25, 2024 Assignment and which CyWee
22 Entity You contend owned the patents listed in Annex A of the September 25, 2024 Assignment
23 (including the Asserted Patents) immediately prior to the September 25, 2024 Assignment being
24 executed.

25 **INTERROGATORY NO. 9:**

26 Describe in detail CyWeeMotion’s efforts in response to CyWee Group’s failure to assign
27 the two patents asserted in *CyWee Group Ltd. v. Samsung Elecs. Co.*, No. 2:17-cv-00140-WCB-
28 RSP (E.D. Tex.) to CyWeeMotion three months after dismissal of CyWee Group’s litigation against

1 Apple as provided by the March 28, 2016 Patent Assignment and License Agreement between
2 CyWee Group and CyWeeMotion.

3 **INTERROGATORY NO. 10:**

4 Identify, separately for each CyWee Entity, the revenue, the quantity of goods or services
5 sold, and costs on a quarterly basis since January 1, 2014.

6 **INTERROGATORY NO. 11:**

7 Identify all Persons who have, since January 1, 2014, invested in, owned any portion of,
8 exercised any control over, provided capital to or for, donated or provided gifts to, or otherwise
9 transferred money or other capital (other than in exchange for products or services) to any of the
10 CyWee Entities, including identifying the CyWee Entity to whom the money or other capital was
11 transferred and identifying the amounts and types of investment, capital, gifts, or money provided
12 by each Person.

13 **INTERROGATORY NO. 12:**

14 Identify any Persons who have (or had at any time since January 1, 2014) ownership,
15 shareholding, or legal or management control in a CyWee Entity, including identifying the CyWee
16 Entity it has ownership, shareholding, or legal or management control in, describing the nature of
17 that ownership or control, and identifying its ownership percentage in that CyWee Entity.

18 **INTERROGATORY NO. 13:**

19 For each CyWee Entity, identify each bank account owned by that CyWee Entity at any
20 point on or after January 1, 2014. The identification should include (a) the address of the bank at
21 which the account is maintained, and (b) purpose of the bank account.

22 **INTERROGATORY NO. 14:**

23 Identify all of the current and former officers, directors, founders, registered agents, and
24 shareholders of each CyWee Entity since January 1, 2014, including identifying the individual's
25 title in the CyWee Entity and the dates of each held such title.

26 **INTERROGATORY NO. 15:**

27 Identify all meetings of the directors, executives, officers, investors, shareholders,
28 employees, or other representatives of each CyWee Entity since January 1, 2014, including

1 identifying each participating individual's title in the CyWee Entity and the dates each held such
2 title.

3 **INTERROGATORY NO. 16:**

4 Identify all current or former employees, independent contractors, consultants, freelance
5 worker, or agents of each CyWee Entity since January 1, 2014.

6 **INTERROGATORY NO. 17:**

7 For each CyWee Entity, identify all of the physical offices since January 1, 2014,
8 including identifying the dates the CyWee Entity occupied and/or otherwise used those offices
9 and describing the nature of the CyWee Entity's operations conducted at those offices.

10 **INTERROGATORY NO. 18:**

11 For each CyWee Entity, identify all assets that the CyWee Entity had ownership interest
12 in, including identifying nature of the ownership interest and the dates that the CyWee Entity
13 possessed this ownership interest.

1 DATED: June 9, 2025

PAUL HASTINGS LLP

2 By: /s/ Elizabeth L. Brann

3 ELIZABETH L. BRANN (SB# 222873)

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19 Attorneys for Plaintiffs

20 Samsung Electronics Co., Ltd. and Samsung

21 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On June 9, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 9, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie

Exhibit 18

1 ELIZABETH L. BRANN (SB# 222873)
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7 [ADDITIONAL COUNSEL LISTED
ON SIGNATURE PAGE]

8 Attorneys for Plaintiffs
9 Samsung Electronics Co., Ltd. and
Samsung Electronics America, Inc.

10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA
13
14 OAKLAND DIVISION

15 SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
16 AMERICA, INC.,

17 Plaintiffs,

18 vs.

19 CM HK, LTD.,

20 Defendant.

CASE NO. 4:24-CV-06567-JST

**PLAINTIFFS' NOTICE OF RULE
30(b)(1) DEPOSITION REGARDING
JURISDICTION TO TIFFANY LIN**

DEMAND FOR JURY TRIAL

1 Pursuant to Rule 30(b)(1), PLEASE TAKE NOTICE that, beginning at 9:30 a.m. PDT on
2 August 1, 2025, Plaintiffs Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
3 (collectively, “Defendants”), by their undersigned attorneys, will take the remote oral and
4 videotaped deposition of Tiffany Lin.

5 The deposition will be reported by a duly authorized court reporter and certified
6 videographer. The deposition will be conducted before an officer authorized to administer oaths
7 and will continue from day-to-day, weekends and legal holidays excluded, until completed, or
8 according to a Court-ordered schedule. The deposition will be taken for the purpose of discovery,
9 for use at trial or any hearing in this matter, and for any other purpose permitted by the Federal
10 Rules of Civil Procedure.

1 DATED: July 23, 2025

Respectfully submitted,

2 By: /s/ Elizabeth L. Brann

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21 Attorneys for Plaintiffs

22 Samsung Electronics Co., Ltd. and Samsung

23 Electronics America, Inc.

CERTIFICATE OF SERVICE

I, Roxanne Hunter-Descheenie, certify and declare as follows:

I am over the age of 18 and not a party to the within action. My business address is Paul Hastings LLP, 4655 Executive Drive, Suite 350, San Diego, CA 92121.

On July 23, 2025, I caused a copy of the foregoing document to be served electronically via email to the following attorneys representing Defendant CM HK, Ltd.:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 23, 2025 in San Diego, California.

By: /s/ Roxanne Hunter-Descheenie
Roxanne Hunter-Descheenie