

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

QUICKER CONNECTIONS LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Case No. 2:24-cv-1074-RWS-RSP

JURY TRIAL DEMANDED

**PLAINTIFF QUICKER CONNECTIONS LLC’S FIRST SET OF REQUESTS
FOR ADMISSION TO DEFENDANT CISCO SYSTEMS, INC. (NOS. 1-9)**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiff Quicker Connections LLC (“Plaintiff” or “Quicker Connections”) hereby requests that Defendant Cisco Systems, Inc. (“Defendant” or “Cisco”) answer, fully and completely, in a sworn writing, within thirty (30) days of service, the following Requests for Admission (“Requests”).

DEFINITIONS AND INSTRUCTIONS

The following terms, whether capitalized or not, shall have the following definitions ascribed thereto:

1. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
2. The term “document” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

3. The term “thing” means any material object, including but not limited to samples, test equipment, production equipment, prototypes, photographs of physical objects, and electronic representations of any of the above.

4. The terms “Plaintiff” and “Defendant” as well as a party’s full or abbreviated name or a pronoun referring to a party mean the party and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

5. The term “you” or “Cisco” means Cisco Systems, Inc. and any and all predecessors, successors, divisions, subsidiaries, or joint ventures thereof, together with any and all parent or affiliated companies or corporations, and all officers, directors, employees, agents, attorneys, representatives, partners, affiliates and all other persons or entities acting or purporting to act or that have acted or purported to have acted on behalf of any of the foregoing.

6. The term “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

7. The term “third party” means any person other than Plaintiff or Defendant.

8. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

9. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.

10. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

11. The use of the singular form of any word includes the plural and vice versa.

12. The term “including” shall be construed to mean “including, but not limited to.”
13. “’943 Patent” means U.S. Patent No. 6,822,943.
14. “’038 Patent” means U.S. Patent No. 6,834,038.
15. “’264 Patent” means U.S. Patent No. 7,054,264.
16. “’859 Patent” means U.S. Patent No. 7,061,859.
17. “’399 Patent” means U.S. Patent No. 7,483,399.
18. The term “Patents-in-Suit” means U.S. Patent Nos. 6,822,943 (the ’943 Patent), 6,834,038 (the ’038 Patent), 7,054,264 (the ’264 Patent), 7,061,859 (the ’859 Patent), and 7,483,399 (the ’399 Patent).
19. “Related Patents and Applications” means any patent or patent application (whether pending, abandoned, or from which a patent has or has not since issued) from or through which a Patent-in-Suit claims priority, or which claims priority, directly or indirectly, to a Patent-in-Suit.
20. “Named Inventors” means the individuals listed as inventors on the face of any of the Patents-in-Suit, specifically Sharon Mantin, Gal Mor Yossi Barsheshet, David Zelig, Leon Bruckman, and Yoav Kotser.
21. “This Action” means this proceeding, captioned *Quicker Connections LLC v. Cisco Systems, LLC* currently pending in the Southern District of New York, bearing case number 2:24-cv-1074.
22. “Previous Patent Litigation” shall mean any all lawsuit, action, proceeding, arbitration, or other formal disputes filed in any court or tribunal, whether federal, state, private, public, or foreign, or before the United States Patent Office, in which you were either (1) named as a defendant and accused of infringing one or more United States Patents, or (2) challenged the

validity, enforceability, priority, or otherwise contested the characteristics of a United States Patent or patent application (other than a Patent or application then owned by or assigned to Cisco).

INSTRUCTIONS

1. Unless you properly object to a Request, you must, under Federal Rule of Civil Procedure 36, admit, specifically deny, or state in detail why you cannot truthfully admit or deny each of the following Requests based on knowledge and information in your possession, custody, or control, or in the possession, custody, or control of your representatives, agents, or attorneys. If you do not respond to each of these requests within thirty (30) days, the requests will be deemed admitted, as described in Federal Rule of Civil Procedure 36.

2. You may not give lack of information or knowledge as a reason for failure to admit or deny a requested admission unless you in good faith state that you have made a reasonable inquiry and that the information known or readily obtainable by you is insufficient to enable you to admit or deny the requested admission.

3. The use of any tense of any verb shall be considered to also include within its meanings all other tenses of the verb so used.

4. As required by the Federal Rules of Civil Procedure, these Requests are continuing in nature and therefore require Cisco to promptly furnish supplemental responses whenever it obtains different or additional knowledge, information, or belief relating to these Requests.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that in its April 29, 2025 letter to Quicker Connections' lead counsel Mr. Erick Robinson, Cisco characterized the document appearing in paragraph 25 of Quicker Connections' First Amended Complaint as an "internal Orckit-Corrigent schematic."

REQUEST FOR ADMISSION NO. 2

Admit that, prior to the filing of this Action, Cisco had received a document containing the contents of the document appearing in paragraph 25 of Quicker Connections' First Amended Complaint.

REQUEST FOR ADMISSION NO. 3

Admit that, prior to the filing of this Action, Cisco had viewed the document appearing in paragraph 25 of Quicker Connections' First Amended Complaint.

REQUEST FOR ADMISSION NO. 4

Admit that, prior to the filing of this Action, Cisco was aware of the contents of the document appearing in paragraph 25 of Quicker Connections' First Amended Complaint.

REQUEST FOR ADMISSION NO. 5

Admit that, prior to the filing of this Action, Cisco was aware of the existence of U.S. Patent No. 7,054,264.

REQUEST FOR ADMISSION NO. 6

Admit that, prior to the filing of this Action, Cisco was aware of the existence of U.S. Patent No. 7,061,859.

REQUEST FOR ADMISSION NO. 7

Admit that, prior to the filing of this Action, Cisco was aware of the existence of U.S. Patent No. 7,483,399.

REQUEST FOR ADMISSION NO. 8

Admit that, prior to the filing of this Action, Cisco was aware of the existence of U.S. Patent No. 6,834,038.

REQUEST FOR ADMISSION NO. 9

Admit that, prior to the filing of this Action, Cisco was aware of the existence of U.S. Patent No. 6,822,943.

Dated: July 11, 2025

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2025, a true and correct copy of the foregoing document was served via email on all counsel of record.

/s/ Erick S. Robinson
Erick S. Robinson