

**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 INTERROGATORIES
TO DEFENDANT CISCO SYSTEMS, INC. (NOS. 1-8)**

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Discovery Order applicable to the present action (Dkt. 34 at 4 ¶ 5) Plaintiff Quicker Connections LLC. ("plaintiff" or "Quicker Connections") hereby requests that Defendant Cisco Systems, Inc. ("defendant" or "Cisco") answer the following interrogatories separately, in writing, under oath and within thirty (30) days from the date of service hereof.

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. When referring to a person, “to identify” means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

5. When referring to documents, “to identify” means to give, to the extent known, the (i) custodian; (ii) location; and (iii) general description of the subject matter of the documents.

6. 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.

7. 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.

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

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

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

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

12. 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.

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

14. The term “including” shall be construed to mean “including, but not limited to.”

15. “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”).

16. “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.

17. “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.

18. “Accused Products” and/or “Accused Instrumentalities” means any methods, systems, technologies, instrumentalities, products, or services made available or used by Cisco whose use, manufacture, license, sale, offer for sale, or importation plaintiff contends infringes, directly or indirectly, any asserted claim of any of the Patents-in-Suit. For the avoidance of doubt, “Accused Products” and/or “Accused Instrumentalities” includes, but is not limited to the

following products and instrumentalities listed below (Entries with an asterisk (*) and/or a pink background are products Quicker Connections intends to add to its existing infringement contentions as additional accused products):

'943 Patent

- The **Cisco CGP-OLT Series**, including at least the following products:

CGP-OLT-8T
CGP-OLT-16T

- The **Cisco CGP-ONT Series**, including at least the following products:

CGP-ONT-1P
CGP-ONT4P
CGP-ONT4PV
CGP-ONT4PVC
CGP-ONT4TVC

- *The **Cisco 10G Routed PON Family**, including at least the following products:

XGS-PON OLT SFP+ Module (Product Number SFP-10G-OLT20-X)
XGS-PON RTU License (Product Number R-PON-10G-RTU)
Cisco PON Manager
Cisco PON Controller
Cisco Routed PON Netconf Server
MongoDB Database

- *The **Cisco NCS 540**, including at least the following products:

N540-24Z8Q2C-SYS
N540-ACC-SYS
N540X-16Z4G8Q2C-A
N540X-16Z4G8Q2C-D
N540-28Z4C-SYS-A
N540-28Z4C-SYS-D
N540-24Q8L2DD-SYS

- *The **Cisco NCS5500**, including at least the following products:

NCS-55A1-24Q6H-SS
NCS-55A2-MOD-S

- *The **Cisco NCS 5700**, including at least the following products:

NCS-57C1-48Q6D
NCS-57C3-MODS-SYS

'038 Patent

- The **Network Convergence System (NCS) 2000 Series**, including at least the following products:

Cisco Network Convergence System (NCS) 2002
Cisco Network Convergence System (NCS) 2006
GE_XP card
10GE_XP card
GE_XPE card
10GE_XPE card
Cisco Network Convergence System (NCS) 2015

'264 Patent

- Cisco's **Optical Networking System (ONS) portfolio under the Multiservice Provisioning Platform (MSPP) category**, including at least the following products:

Cisco ONS 15454 SONET Multiservice Provisioning Platform (MSPP)

- The **Cisco ONS 15600** series, including at least the following products:

Cisco ONS 15600

'859 Patent

- Cisco's **Optical Networking System (ONS) portfolio under the Multiservice Provisioning Platform (MSPP) category**, including at least the following products:

Cisco ONS 15454 SONET Multiservice Provisioning Platform (MSPP)

- Cisco **ONS 15600 series**, including at least the following products:

Cisco ONS 15600

'399 Patent

- Cisco's **Optical Networking System (ONS) portfolio under the Multiservice Provisioning Platform (MSPP) category**, including at least the following products:

Cisco ONS 15454 SONET Multiservice Provisioning Platform (MSPP)

- The Cisco **ONS 15600 series**, including at least the following products:

Cisco ONS 15600

- *Cisco **ML-Series cards for the ONS 15454**, including at least the following products:

ML-MR-10

ML100T-12

ML100X-8

ML1000-2

The identification of such products does not preclude the inclusion of any others responsive to these Interrogatories. In addition, any and all products that include the above should be considered within the scope of Accused Products and/or Accused Instrumentalities.

19. “This Action” means this proceeding, *Quicker Connections LLC v. Cisco Systems, Inc.*, currently pending in the Eastern District of Texas, case number No. 2:24-cv-1074-JRG.

INSTRUCTIONS

1. If you object to part of any interrogatory, plaintiff requests that you at least respond to that portion of the interrogatory that is unobjectionable and specifically identify that portion of the request that is allegedly objectionable.

2. If you cannot respond to any interrogatory in full, you shall respond to it to the extent possible, with an explanation as to why a full response is not possible.

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. Pursuant to Rule 26 of the Federal Rules of Civil Procedure, these interrogatories are continuing in nature and therefore require Cisco to furnish supplemental responses whenever it obtains different or additional knowledge, information, or belief relating to these interrogatories.

INTERROGATORIES

INTERROGATORY NO. 1.

Identify, by name, model numbers, and any other identifying information used by Cisco, each version of each Accused Product or Accused Instrumentality, including by model number, name, internal code name or other designation, along with previous or predecessor versions having substantially the same or similar functionality, along with the first (and, if applicable, last) date of first manufacture, design, sale, and/or offer for sale for each such product and version.

INTERROGATORY NO. 2.

Identify, for each Accused Product or Accused Instrumentality responsive to Interrogatory No. 1, Cisco's total sales, profits, net profits, gross profits, revenues, expenditures, and other information attributable to each Accused Produce or Accused Instrumentality, on a quarterly basis,

for the six years prior to the filing of the Complaint in this action against Cisco through to the present (i.e. from December 24, 2018 to through to the present).

For the avoidance of doubt, this information should include, for each unit of each Accused Product or Accused Instrumentality for period from December 24, 2018, to the present:

- a. the date of its first (and, if applicable, last) manufacture, use, sale, offer for sale, licensing, or distribution, or importation into, the United States;
- b. the number of units sold or licensed inside the United States on a quarterly and annual basis;
- c. the number of units sold or licensed outside the United States on a quarterly and annual basis for units that were manufactured, used, assembled or in any other manner were in the United States at any time;
- d. the sales or licensing revenue inside the United States on a quarterly and annual basis;
- e. the sales or licensing revenue outside the United States on a quarterly and annual basis for units that were manufactured, used, assembled or in any other manner were in the United States at any time;
- f. the gross and net profits realized by Cisco on a quarterly and annual basis associated with the sales or licensing revenues reported in response to parts (d) and (e) of this Interrogatory;
- g. Cisco's direct costs (reported by category, such as labor or materials) on a quarterly and annual basis associated with the manufacture or production of units sold or licensed, as identified in response to parts (b) and (c) of this Interrogatory; and
- h. Cisco's operating expenses (reported by category, such as marketing, sales commissions, research & development, etc.) on a quarterly and annual basis associated with the manufacture or production of units sold or licensed, as identified in response to parts (b) and (c) of this Interrogatory.

INTERROGATORY NO. 3.

For each Accused Product or Accused Instrumentality that Cisco contends does not infringe any of the Asserted Claims, describe in detail the factual and legal bases for Cisco's contention that the Accused Instrumentality does not infringe each such Asserted Claim, including

the identity of each claim limitation that Cisco contends is not met and why that limitation is not met, and identify all documents that refer or relate to or which support that contention.

INTERROGATORY NO. 4.

Describe in detail the specific bases, including citations to any documents and testimony, for Cisco's "Government Sales" defense (see D.I. 41 at 19).

INTERROGATORY NO. 5.

Describe in detail the specific bases, including citations to any documents and testimony, for Cisco's "Equitable Doctrine" defense (see D.I. 41 at 19).

INTERROGATORY NO. 6.

Describe in detail the specific bases, including citations to any documents and testimony, for Cisco's "Prosecution History Estoppel and Ensnarement" defense (see D.I. 41 at 19).

INTERROGATORY NO. 7.

Describe in detail the specific bases, including citations to any documents and testimony, for Cisco's "License" defense (see D.I. 41 at 20-21).

INTERROGATORY NO. 8.

Describe in detail the specific bases, including citations to any documents and testimony, for Cisco's "Reverse Doctrine of Equivalents" defense (see D.I. 41 at 21).

Dated: June 5, 2025

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 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