

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

QUICKER CONNECTIONS LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 2:24-cv-1074-RWS-RSP

JURY TRIAL DEMANDED

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

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Cisco Systems, Inc. ("Cisco") hereby makes the following objections and responses to Plaintiff Quicker Connections LLC's ("Quicker Connections" or "QC") First Set of Requests for Admission to Cisco, served on July 11, 2025. Cisco reserves the right to supplement or amend these objections and responses to the extent allowed by the Federal Rules of Civil Procedure, the Local Rules of this Court, and any applicable scheduling orders.

GENERAL OBJECTIONS

Cisco makes the following general objections to Quicker Connections' First Set of Requests for Admission (Nos. 1-9), which apply to each request regardless of whether the general objections are specifically incorporated into the specific objections and responses below.

1. Cisco objects to each request, to the extent it calls for information that is protected from discovery by the attorney-client privilege, work product doctrine, or joint defense/common interest privilege, or that is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, any applicable orders of the Court, or

relevant statutory or case law. Inadvertent disclosure of any such information shall not be deemed a waiver of any privilege or immunity.

2. Cisco objects to each request and to each definition to the extent it seeks to impose any requirements or obligations in addition to or different from those set forth in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules of this Court, any applicable orders of this Court, any stipulation or agreement of the parties, and/or relevant statutory or case law.

3. Cisco objects to each request to the extent it is duplicative, repetitive, or overlapping of other requests made now or in the future.

4. Cisco objects to each request to the extent it calls for legal conclusions, presents questions of pure law, calls for expert opinion, or exceeds the permissible number of Requests for Admission, including subparts.

5. Cisco objects to each request to the extent it calls upon Cisco to disclose or analyze documents or other information that is not within the possession, custody, or control of Cisco; that are not kept in the ordinary course of Cisco's business; that can be obtained from other sources that are more convenient, less burdensome, and/or less expensive; that are equally available to QC; or that are publicly available and, therefore, of no greater burden for QC than Cisco to obtain.

6. Cisco objects to each request to the extent it calls for confidential or proprietary information of any individual or entity other than Cisco.

7. Cisco objects to each request as overbroad, unduly burdensome, and calling for information that is neither relevant to any party's claim or defense nor proportional to the needs of the case. For example, Cisco objects to each request to the extent it calls for information beyond the relevant temporal or geographic scope of this matter.

8. Cisco objects to each request as overbroad, unduly burdensome, and calling for information that is neither relevant to any party's claim or defense nor proportional to the needs of the case to the extent it calls for information unrelated to the Patents-in-Suit, the alleged patented technology, the features of the products accused of infringement, or any relevant issue in this action.

9. Cisco objects to Quicker Connections' definition of "Defendant," "You," and "Cisco" to the extent that that definition includes any persons or entities other than Cisco, who are not parties to this action.

10. Cisco objects to the terms "document," "thing," and communication," as well as Quicker Connections' definition of those terms as overbroad to the extent that it includes documents that are outside the scope contemplated by Federal Rules of Civil Procedure 26 and 34.

11. Cisco's discovery and investigation in connection with this case are continuing. As a result, Cisco's objections and responses are limited to information obtained and reviewed to date and are given without prejudice to Cisco's right to amend or supplement these objections and responses as discovery and Cisco's investigation in this case proceed.

SPECIFIC RESPONSES AND OBJECTIONS

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."

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case

law. Cisco further objects to this request as outside the scope of Fed. R. Civ. P. 36 and 26. Cisco further objects to this request as vague and ambiguous with regard to the term “characterized.” Cisco further objects to this request to the extent it conflates “Cisco” with outside counsel hired by Cisco. Cisco further objects to the extent this request seeks admissions as to the authenticity, reliability, foundation, or other admissibility criteria, of a document in Quicker Connections’, not Cisco’s, possession, custody, or control. Cisco further objects to this request as irrelevant and not reasonably calculated to lead to admissible evidence.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Cisco objects to this request for foregoing reasons and as outside of the scope of Fed. R. Civ. P. 36 and 26. Cisco’s counsel’s discovery letters speak for themselves, and do not form the bases of proper requests for admissions. Cisco, on that basis, denies this request.

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.

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Cisco further objects to this request as vague and ambiguous with regard to the terms “received” and “contents.”

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Cisco further objects to this request as vague and ambiguous with regard to the term "viewed."

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case

law. Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware” and “contents.”

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware” and “existence.” Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Further, this request improperly calls for a legal conclusion, including to the extent it seeks to use the term “aware” to imply and/or allege any knowledge of Cisco relevant to, for example, potential damages claims under 35 U.S.C. § 284 or pre-suit willfulness under § 285, which is not alleged.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware” and “existence.” Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Further, this request improperly calls for a legal conclusion, including to the extent it seeks to use the term “aware” to imply and/or allege any knowledge of Cisco relevant to, for example, potential damages claims under 35 U.S.C. § 284 or pre-suit willfulness under § 285, which is not alleged.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware”

and “existence.” Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Further, this request improperly calls for a legal conclusion, including to the extent it seeks to use the term “aware” to imply and/or allege any knowledge of Cisco relevant to, for example, potential damages claims under 35 U.S.C. § 284 or pre-suit willfulness under § 285, which is not alleged.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware” and “existence.” Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Further, this request improperly calls for a legal conclusion, including to the extent it seeks to use the term “aware” to imply and/or allege any knowledge of Cisco relevant to, for example, potential damages claims under 35 U.S.C. § 284 or pre-suit willfulness under § 285, which is not alleged.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

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.

OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Cisco incorporates its General Objections. Cisco objects to this request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or is otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Eastern District of Texas Local Rules, and/or the relevant statutory or case law. Cisco further objects to this request as vague and ambiguous with regard to the terms “aware” and “existence.” Cisco further objects to this request to the extent it calls for information irrelevant to any issue in this case and not proportional to the needs of the case. Further, this request improperly calls for a legal conclusion, including to the extent it seeks to use the term “aware” to imply and/or allege any knowledge of Cisco relevant to, for example, potential damages claims under 35 U.S.C. § 284 or pre-suit willfulness under § 285, which is not alleged.

Based on its investigation to date, and subject to the foregoing General and Specific Objections, Cisco responds as follows:

Denied.

Dated: August 11, 2025

By: /s/ Deborah J. Mariottini
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CERTIFICATE OF SERVICE

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

/s/ Deborah J. Mariottini

Deborah J. Mariottini