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Attorneys for Plaintiff LS Cable & System Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LS CABLE & SYSTEM LTD.,
Plaintiff,
v.
APPLE INC.,
Defendant.

Case No. 3:24-cv-09194-JD

**PLAINTIFF LS CABLE & SYSTEM
LTD.'S FIRST SET OF
INTERROGATORIES TO
DEFENDANT APPLE INC. (NOS. 1-8)**

1 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff LS Cable &
2 System Ltd. ("LS Cable"), by and through its undersigned counsel, hereby submits its First Set of
3 Interrogatories (Nos. 1–8) to Defendant Apple Inc. ("Apple"), and requests that Apple answer each
4 of the following interrogatories separately, fully, and under oath, pursuant to Rule 33, and within
5 thirty (30) days of service. Apple is requested to supplement all responses to these interrogatories
6 as required by Federal Rule of Civil Procedure 26(e).

7 **DEFINITIONS**

8 The following definitions shall apply throughout these Interrogatories, regardless of
9 capitalization:

10 1. The terms "Defendant," "You," "Your," and "Apple" mean Defendant Apple Inc.
11 and its present and former directors, officers, employees, parent organization(s), subsidiary
12 organization(s), predecessors in interest, successors in interest, divisions, servants, agents,
13 attorneys, consultants, partners, associates, investigators, representatives, accountants, financial
14 advisors, distributors, and any other person acting on its behalf, pursuant to its authority or subject
15 to its control.

16 2. The terms "Plaintiff" or "LS Cable" mean Plaintiff LS Cable & System Ltd. and its
17 present and former directors, officers, employees, parent organization(s), subsidiary
18 organization(s), predecessors in interest, successors in interest, divisions, servants, agents,
19 attorneys, consultants, partners, associates, investigators, representatives, accountants, financial
20 advisors, distributors, and any other person acting on its behalf, pursuant to its authority or subject
21 to its control.

22 3. The terms "person" or "persons" include, without limitation, both natural persons
23 and entities (including corporations, proprietorships, partnerships, associations, joint ventures,
24 governmental agencies, and other entities, and any combination thereof, and all predecessors in
25 interest, successors, affiliates, subsidiaries, and related entities).

26 4. The terms "Third Party" or "Third Parties" mean any natural person, corporation,
27 partnership, association, joint venture, government body, or other legal entity other than Plaintiff
28 and Defendant.

1 5. The term “document(s)” includes all things within the meaning and scope of that
2 term as used in the Federal Rules of Civil Procedure and the Federal Rules of Evidence, and
3 includes without limitation, all of the following matter in Your actual or constructive possession,
4 custody, or control, whether printed, recorded, microfilmed, stored electronically or optically, or
5 reproduced by any process, or written or produced by hand, or recorded in any other way, and
6 whether or not claimed to be privileged, confidential, or personal: any and all originals, copies,
7 drafts (and all versions not identical in every respect to the original) of any letters; correspondence;
8 memoranda; notes; reports; records; agreements; working papers; communications (including
9 intradepartmental and interdepartmental communications); summaries or records of personal
10 conversations; calendars; diaries; forecasts; statistical statements; graphs; laboratory or research
11 reports and notebooks; charts; minutes or records of conferences; expressions or statements of
12 policy; lists or persons attending meetings or conferences; reports or summaries of interviews;
13 reports or summaries of investigations; opinions or reports of consultants; patent and patent
14 application materials; patent appraisals; printed publications; trademark applications; certificates
15 of registration; opinions of counsel; reports of or summaries of either negotiations within or without
16 the corporation or preparations for such; bulletins; material and manufacturing specifications;
17 material packaging; manufacturing logs; functional specifications; equipment specifications and
18 operating information; product packaging, designs, instructions; literature, work assignments;
19 memoranda of conversations; notes; notebooks; drafts; data sheets; worksheets; contracts;
20 memoranda of agreements; assignments; licenses; minute books of account; orders; invoices;
21 statements; bills; checks; vouchers; photographs; knowledge base documents; technical support
22 documents; application notes; advertisements; circulars; press releases; books; instruments;
23 accounts; bills of sale; tapes; electronic communications including, but not limited to, E-mails;
24 telegraphic communications and all other material of any tangible medium of expression; and
25 original or preliminary notes. Any document bearing marks, including without limitation, initials,
26 stamped initials, comments, or notations not a part of the original text or photographic reproduction
27 thereof, is to be considered a separate “document.” A draft or non-identical copy is a separate
28 document within the meaning of this term. In addition, electronically stored information is any

1 information that is stored electronically and includes, but is not limited to: writings, drawings,
2 graphs, charts, photographs, sound recordings, images, email from any type of e-mail system, e-
3 mail attachments, facsimiles, and other data or data compilations, stored in any medium from which
4 information can be obtained, including personal computer drives, external hard drives,
5 server/network drives, databases, CDs, diskettes, floppy disks, PDAs, Blackberries, laptops,
6 voicemail, Zip-drives, flash/thumb/or any other type of external drives.

7 6. The terms “communication” or “communication(s)” mean every manner or method
8 of the disclosure, transfer, transmission, or exchange of information, in whatever form, by whatever
9 means, including, but not limited to, oral, written, face-to-face, telephone, facsimile, network
10 transfer, electronic mail, smartphone messages, voice-mail, text messages, postal mail, personal
11 delivery, or otherwise, at any time or place under any circumstances. The definition is not limited
12 to transfers between persons but also includes other transfers, such as records and memoranda to
13 file; any written letter, memorandum, or other document which was sent by one or more individuals
14 to another or others; any telephone call between one or more individuals and another or others,
15 whether such call was by chance or prearranged, formal or informal; and any conversation or
16 meeting between one or more individuals and another, whether such contact was by chance or
17 prearranged, formal or informal. This definition also includes all transcripts, summaries, electronic
18 recordings, audio tapes and audio files constituting, reflecting or transcribing such
19 communications.

20 7. The terms “case” or “litigation” refer to *LS Cable & System Ltd. v. Apple Inc.*, Case
21 No. 3:24-cv-09194, filed in the Northern District of California on December 18, 2024.

22 8. The terms “United States” or “U.S.” shall refer to the United States, its territories,
23 and possessions.

24 9. The terms “the ’568 Patent” or “Asserted Patent” refer to United States Patent No.
25 8,013,568, titled “Contact-Less Chargeable Battery And Charging Device, Battery Charging Set,
26 And Charging Control Method Thereof,” issued on September 6, 2011, and subsequently subject
27 to reexamination, with a Reexamination Certificate issued on September 28, 2023.
28

1 10. The term “the ’355 Application” refers to United States Patent Application No.
2 96/000,355, which is the application that led to the Reexamination Certificate for the ’568 Patent.

3 11. The terms “Related Patent,” “Related Patents,” “Related Application,” or “Related
4 Applications” mean (1) any U.S. or foreign patent or patent application related to the Asserted
5 Patent or its application by way of subject matter or claimed priority date, (2) all parent, divisional,
6 continuation, continuation-in-part, reissue, reexamination, extension, and foreign counterpart
7 patents and applications of the Asserted Patent, and/or (3) any patent or patent application filed by
8 or assigned to one or more of the same applicant(s) (or his or her assignees) that refer to any of (1)
9 or (2) herein.

10 12. The terms “Patent Application” or “Patent Applications” mean the application or
11 applications, including material purportedly incorporated by reference therein, and any
12 amendments, additions, or deletions, from which the Asserted Patent issued.

13 13. The term “reference” means any document or thing in any way discussing,
14 describing, or showing any technology that is any way related to the subject matter disclosed or
15 described in a patent or patent application.

16 14. The term “prior art” refers to any reference, publication, patent, physical specimen,
17 use, invention by another, sale, offer for sale, or other activities that You believe are relevant to the
18 validity of the Asserted Patent.

19 15. The term “Accused iPhone Devices” means each and every product, apparatus,
20 system, method, or process that infringe any of the claims of the Asserted Patent including at least
21 Apple’s iPhone 8, iPhone 8 Plus, iPhone X, iPhone XS, iPhone XS Max, iPhone XR, iPhone 11,
22 iPhone 11 Pro, iPhone 12, iPhone 12 Mini, iPhone 12 Pro, iPhone 12 Pro Max, iPhone 13, iPhone
23 13 Mini, iPhone 13 Pro, iPhone 13 Pro Max, iPhone 14, iPhone 14 Plus, iPhone 14 Pro, iPhone 14
24 Pro Max, iPhone 15, iPhone 15 Plus, iPhone 15 Pro, iPhone 15 Pro Max, iPhone 16, iPhone 16Plus,
25 iPhone 16 Pro, iPhone 16 Pro Max, the various iPhone SE generations, and any similarly situated
26 iPhone.

27 16. The term “Accused Apple Watch Devices” means each and every product,
28 apparatus, system, method, or process that infringe any of the claims of the Asserted Patent

1 including at least Apple's Apple S3, Apple S4, Apple S5, Apple S6, Apple S7, Apple S8, Apple
2 S9, and Apple S10, and other similarly structured packages, all versions of the Apple Watch,
3 including the first-generation Apple Watch and the Apple Watch Series 1 through Series 10.

4 17. The term "Accused AirPods Devices" means each and every product, apparatus,
5 system, method, or process that infringe any of the claims of the Asserted Patent including at least
6 Apple's Apple AirPods first-generation, AirPods second-generation, AirPods third-generation,
7 AirPods Pro 2, AirPods 3, and AirPods 4, and other similarly structured AirPods products.

8 18. The term "Accused Products" refers collectively to the Accused iPhone Devices,
9 Accused Apple Watch Devices, and Accused AirPods Devices.

10 19. The term "Asserted Claims" refers to the patent claims that are identified in LS
11 Cable's operative infringement contentions.

12 20. The term "infringe" or any variant thereof, including, but not limited to, "infringes,"
13 "infringing," and "infringement," means any infringement pursuant to 35 U.S.C. § 271, whether
14 direct, indirect, contributory, or by inducement.

15 21. The terms "concern," or "concerning," "pertain" or "pertaining," and "relate" or
16 "relating" shall be construed in their most inclusive sense, and shall mean, in addition to their
17 customary and usual meaning, discuss or discussing, mention or mentioning, embody or
18 embodying, contain or containing, constitute or constituting, refer or referring, evidence or
19 evidencing, negate or negating, reflect or reflecting, describe or describing, assess or assessing,
20 record or recording, show or showing, support or supporting, underlie or underlying, summarize or
21 summarizing, report or reporting, and, without limitation, in any way legally, logically or factually
22 connected with the matter discussed.

23 22. The terms "constitute" or "constituting," "refer" or "referring," "regard" or
24 "regarding," and "reflect" or "reflecting" shall mean, in addition to their customary and usual
25 meaning, discuss or discussing, mention or mentioning, embody or embodying, contain or
26 containing, concern or concerning, pertain or pertaining, evidence or evidencing, negate or
27 negating, describe or describing, assess or assessing, record or recording, show or showing, support
28

1 or supporting, underlie or underlying, summarize or summarizing, report or reporting, and, without
2 limitation, in any way legally, logically or factually connected with the matter discussed.

3 23. The terms “relating to,” “relate to,” “relates to,” or “related to” mean affecting,
4 concerning, comprising, constituting, dealing with, describing, embodying, evidencing,
5 identifying, involving, mentioning, providing a basis for, reflecting, regarding, respecting, referring
6 to, pertaining to, relevant to, or connected with a stated subject matter.

7 24. The terms “include,” “includes,” and “including” shall be deemed to be followed by
8 the phrase “without limitation.”

9 25. The term “each” means all, each, and every.

10 26. The term “every” means all, each, and every.

11 27. The term “all” means all, each, and every.

12 28. The term “any” means any and all.

13 29. The singular of any word or phrase shall include the plural of such word or phrase.

14 30. The plural of any word or phrase shall include the singular of such word or phrase.

15 31. Unless otherwise indicated by the context, the term “identify”:

16 a. when used in connection with documents, means to furnish (i) the type of
17 document; (ii) the litigation document control number; (iii) a summary of the document’s subject
18 matter and content; (iv) the document’s title or identifying symbol, (v) the date of the document,
19 (vi) the author(s) of the document; (vii) the name(s) and address(es) of the person(s), if any, to
20 whom the document was directed; (viii) the document’s current or last known location; and (ix) the
21 name and address of the custodian of the document;

22 b. when used in connection with a person or persons, means to furnish a
23 statement of the full name, job title or function, and the last known business and home addresses;

24 c. when used in connection with things, including products or other physical
25 objects, means to furnish a complete description of the thing or things, including, for each thing,
26 the model number and/or product code, version number, commercial name, functional designation,
27 trademark, trade name, internal name, project name, any other nomenclature used to specify its
28

1 common designation, its composition, its physical characteristics, and any other distinguishing
2 characteristics; and

3 d. when used in connection with events, means to provide a description of the
4 event, the date of the event, the location of the event, and the individual and/or organizational
5 entities participating in the event.

6 e. The term “date” means the exact day, month, and year if ascertainable, or if
7 not, your best approximation thereof.

8 32. With respect to any instance in which you are called on to identify a natural person,
9 provide the following information regarding that natural person: the person’s full name; the
10 person’s present or last known address; the person’s present or last known telephone number; the
11 name of the person’s present or last known employer, along with that employer’s address; and the
12 person’s present or last known job title.

13 33. The terms “and,” “or,” and “and/or” shall be construed in the conjunctive or the
14 disjunctive, whichever makes the request more inclusive.

15 34. All pronouns shall be construed to refer to the masculine, feminine, or neutral
16 gender, in singular or plural, as in each case make the request more inclusive.

17 **INSTRUCTIONS**

18 1. These interrogatories apply to all information in your possession, custody, or control
19 and/or the possession, custody, or control of any of your employees, agents, corporations, parent
20 or subsidiary corporations, and/or divisions or affiliates, as well as experts or consultants retained
21 by you, and anyone else acting on your behalf.

22 2. These interrogatories are not limited by time unless stated within the request itself.

23 3. Unless otherwise stated, the geographic scope covered by these interrogatories is
24 worldwide.

25 4. If any document is produced in response to an interrogatory below, then pursuant to
26 Federal Rule of Civil Procedure Rule 33(d), designate the interrogatory or interrogatories to which
27 each such document responds and identify the document by Bates number.
28

1 5. In producing documents or tangible things pursuant to these demands, Apple must
2 conform to the requirements of Rule 34(b) of the Federal Rules of Civil Procedure. This means
3 that Apple shall produce documents as they are kept in the usual course of business or shall organize
4 and label the documents to correspond with the categories in the interrogatories.

5 6. If a document responsive to any interrogatory is no longer in your possession,
6 custody, or control, because it has been discarded, destroyed, or lost, or for any other reason,
7 provide the following information with regard to such document: (a) the date the document was
8 written, prepared, generated, or sent; (b) the name(s) and address(es) of the author(s) and any
9 addressee(s); (c) the names and addresses of all persons receiving copies of the document; (d) the
10 subject matter of the document; (e) the reason(s) such document was discarded, destroyed, or is no
11 longer in your possession, custody or control; and (f) if discarded or destroyed, the names of those
12 individuals who authorized or approved the decision to discard or destroy such document (if no
13 individuals authorized or approved the decision to discard or destroy such document, indicate that
14 no such authorization was given), the names of those individuals who discarded or destroyed such
15 document, and the date on which such document was discarded or destroyed.

16 7. If Apple withholds any documents or tangible things under a claim of privilege,
17 please furnish with the response to these demands a privilege and/or redaction log identifying each
18 document or tangible thing for which privilege is claimed, including the following information: (a)
19 the date, sender, recipient, and subject matter of the document or tangible thing; (b) the basis upon
20 which privilege is claimed; and (c) the paragraphs, paragraph or subparts of the demand to which
21 the document or tangible thing corresponds.

22 8. If You are unable to answer any of the following interrogatories fully and
23 completely after exercising due diligence to secure the information necessary to make full and
24 complete answers, so state. Answer each such interrogatory to the fullest extent possible,
25 specifying the knowledge available to You and state whatever information or knowledge You may
26 have concerning the unanswered portions of the interrogatory.

27 9. If You have a good faith objection to any interrogatory or any part thereof, You shall
28 state the specific nature of the objection and whether it applies to the entire interrogatory or to a

1 part of the interrogatory. If You object to any part of an interrogatory, You should identify the part
2 objected to and provide a response to the remaining unobjectionable part.

3 10. If You contend that any phrase or term is subject to more than one interpretation,
4 You shall set forth such phrase or term and the interpretation used in answering the interrogatory.

5 11. If You object to any interrogatory on the ground that it is vague and/or ambiguous,
6 identify the particular words, terms, or phrases that You assert make such request vague and/or
7 ambiguous and specify the meaning You actually attribute to such words, terms, or phrases for
8 purposes of Your response.

9 12. These interrogatories are continuing in nature under Rule 26(e) of the Federal Rules
10 of Civil Procedure. Any additional responsive information or documents which become known to
11 Defendant, up to and including the close of the discovery period, shall be furnished to Plaintiff
12 within a reasonable time after such information becomes known to Defendant. To the extent that
13 Defendant acquires or becomes aware of additional documents or information responsive to these
14 interrogatories, it is required to change, supplement, and amend its answers thereto as prescribed
15 in Rule 26(e) of the Federal Rules of Civil Procedure.

16 **INTERROGATORIES**

17 **INTERROGATORY NO. 1:**

18 Identify by name, model number, and any other identifying indicia any Apple products that
19 use or include wireless charging technology, and for each product, identify the individuals
20 responsible for its design, development, marketing, manufacture, testing, and sales.

21 **INTERROGATORY NO. 2:**

22 For the Accused Products and any other product identified in response to Interrogatory No.
23 1, identify the total number of units sold, total sales in dollar value, location of each sale for each
24 calendar quarter of sales, and the applicable gross and net profit margins as computed by Apple.

25 **INTERROGATORY NO. 3:**

26 Describe in detail the design and development of the Accused Products and any other
27 product identified in response to Interrogatory No. 1, including any involvement of third parties in
28

1 the design, development, and/or testing of the Accused Products; when the development began;
2 why the development began; and who was involved in the development.

3 **INTERROGATORY NO. 4:**

4 Describe in detail all facts and circumstances under which Apple first became aware of the
5 post-grant proceeding involving U.S. Patent Application No. 96/000,355, whether during
6 supplemental examination or ex parte reexamination, that led to the issuance of the Reexamination
7 Certificate for the '568 Patent, including, but not limited to, the date(s) when this awareness
8 occurred, the source of the information, the identity of the person(s) who received the information
9 on behalf of Apple, and any actions taken by Apple or any of its directors, officers, or employees
10 as a result of that awareness, and identify each person with knowledge of the foregoing and all
11 documents relating to the foregoing.

12 **INTERROGATORY NO. 5:**

13 For each Accused Product, identify what You contend the smallest saleable infringing unit
14 to be and the factual basis supporting Your contention, including: (a) an identification of the
15 components or features of the Accused Product that You contend comprises the smallest saleable
16 patent practicing unit; (b) the factual basis supporting Your contention; and (c) for each Accused
17 Product, the cost of the hardware and software that comprise what You contend is the smallest
18 saleable patent practicing unit.

19 **INTERROGATORY NO. 6:**

20 Identify the facts and circumstances relating to Apple's existing or contemplated inbound
21 and outbound licenses, settlement agreements, covenants not to sue, or other agreements
22 concerning wireless charging technology, and all facts and circumstances surrounding negotiation,
23 execution, and administration of those agreements, including but not limited to (i) an identification
24 of all such agreements or contemplated agreements; (ii) all facts surrounding the negotiation of the
25 agreement or proposed agreement; (iii) any disputes that have arisen in relation to the agreement
26 and how they were resolved; (iv) the current status of the agreement; and (v) all money or other
27 consideration received or given under the agreement.

28

1 **INTERROGATORY NO. 7:**

2 To the extent You contend You do not infringe an Asserted Claim, identify all facts and
3 circumstances that support that contention.

4 **INTERROGATORY NO. 8:**

5 Explain, in detail, the research and development process leading to the adoption and release
6 of Apple's MagSafe technology, including the reason for the adoption, any proposals considered
7 and rejected, as well as describe any need to remain backwards compatible with non-MagSafe
8 wireless chargers, including identifying all documents describing the need to maintain
9 compatibility with non-MagSafe chargers and explain the efforts undertaken to ensure
10 compatibility with those non-MagSafe chargers.

1 Dated: March 20, 2025

Respectfully submitted,

2 /s/ Erik J. Halverson

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13 *Attorneys for Plaintiff LS Cable & System Ltd.*

1 **CERTIFICATE OF SERVICE**

2 I am employed in the county of San Francisco, State of California. I am over the age of 18
3 and not a party to the within action; my business address is: K&L GATES LLP, 4 Embarcadero
4 Center, Suite 1200, San Francisco, CA 94111.

5 On March 20, 2025, I caused to be served the document(s) described as:

- 6 • **PLAINTIFF LS CABLE & SYSTEM LTD.'S FIRST SET OF**
7 **INTERROGATORIES TO DEFENDANT APPLE INC. (NOS. 1-8)**

8 on the interested parties in this action by delivering a true copy thereof as follows:

9 Richard S.J. Hung 10 rhung@mofo.com 11 MoFo-Apple_LSC@mofo.com 12 Meredith L. Angueira 13 MAngueira@mofo.com 14 Shaelyn K. Dawson 15 ShaelynDawson@mofo.com 16 MORRISON & FOERSTER LLP 17 425 Market Street 18 San Francisco, CA 94105 19 (415) 268-7000	Aaron D. Bray abray@mofo.com Stephen Liu sliu@mofo.com MORRISON & FOERSTER LLP 755 Page Mill Road Palo Alto, CA 94304 (650) 813-5600 Ryan J. Malloy rmalloy@mofo.com MORRISON & FOERSTER LLP 707 Wilshire Boulevard, Suite 6000 Los Angeles, CA 90017 (213) 892-5200
20 <i>Attorneys for Defendant</i> 21 APPLE INC.	

- 22 ☒ **BY ELECTRONIC SERVICE:** by transmitting a true copy of the foregoing document(s)
23 to the e-mail addresses set forth above.

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct.

26 Executed on March 20, 2025, at San Francisco, California.

27 /s/ Erik J. Halverson
28 Erik J. Halverson