

Wapp EX2041
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- a. an individual person, means to state his or her full name, present or last known employer, job title, job description, present or last known residence addresses, and present or last known business addresses;
 - b. a business entity, means to state the full name and address of the entity and the names and positions of the individual or individuals connected with such entity who have knowledge of the information requested.
 - c. a document, means to identify the document by bates number, or if it is not bates numbered, to state the type of document (letter, memorandum, email, etc.), its dates, author(s) or originator(s), addressee(s), all individuals who received copies of the document, the identity of persons known or believed by you to have present possession, custody or control thereof, and a brief description of the subject matter and present location. The foregoing is unnecessary if the document is being produced in lieu of the answer to an Interrogatory. If the document has already been produced, “identify” means to provide the production number of the document.
 - d. a product, software, service, system or method means to specify a part number, trade name, catalog number, version number, and any other designation used to refer to the product, software, service, system or method.
3. As used herein, the terms “you,” “your,” and “yours,” or “Apple” refer Apple Inc.; its parents, subsidiaries, and affiliates; and its officers, directors, employees, representatives, agents, and all persons acting on their behalf.
4. As used herein, the terms “Plaintiffs” and “Wapp” mean Wapp Tech Limited Partnership and Wapp Tech Corp in the above-styled civil action and its officers, directors, employees, representatives, and agents.

5. As used herein, the terms “and” as well as “or” shall be construed either disjunctively or conjunctively and references shall be construed either as singular or plural as necessary to bring within the scope of these requests any information or documents and electronically stored information that might otherwise be construed to be outside their scope.

6. As used herein, the term “including” means “including but not limited to.”

7. As used herein, the term “all” means all or any, and the term “any” means all or any.

8. Each date range listed in the interrogatories shall be treated as including the beginning and endpoints of that date range. For example, a date range requesting information for “each year since 2017” would include the years 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024 and 2025 (assuming present day is in 2025), and would need to be updated to include 2026 when the year 2026 begins.

9. As used herein, the term “employee” means any director, trustee, officer, employee, agent, consultant, partner, corporate parent, subsidiary, affiliate, or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

10. “Best Buy” means Best Buy Purchasing LLC, its parents, subsidiaries, and affiliates; and its officers, directors, employees, representatives, agents, and all persons acting on their behalf.

11. “Apple Best Buy Agreements” means all contracts or agreements between Best Buy and Apple that relate to any Eastern District of Texas Best Buy Apple Shop, including Exhibits 1-6 to Apple’s Motion to Dismiss (Dkt. 62).

B. Instructions

1. Each interrogatory shall be answered fully unless it is in good faith objected to, in which event the reasons for your objection shall be stated in detail. If an objection pertains to only a portion of an interrogatory or a word, phrase, or clause contained within an interrogatory, you are required to state your objection to that portion only and to respond to the remainder of the interrogatory using your best efforts to do so. Your responses and objections, if any, are to be signed by the attorney making them.

2. If in responding to any of these interrogatories you encounter any ambiguity in construing the interrogatory or any definition or instruction relevant to the interrogatory, set forth the matter deemed ambiguous and the construction selected or used in responding to the interrogatory.

3. If the procedure for answering interrogatories as authorized by Fed. R. Civ. P. 33(d) is used, for each interrogatory and subpart thereof, you must identify the production with specificity (i.e., bates numbers of the specific document or group of documents).

4. You must preserve and produce all information and documents in your possession, custody or control that are relevant to the claims or defenses in this lawsuit or reasonably calculated to lead to the discovery of admissible evidence. Especially since you are in the best position to know the nature and extent of discoverable information and documents in your possession, custody or control, any limits on these discovery requests should not be used to justify the loss, overwriting, purging, destruction or non-production of anything discoverable. Before you permit any such loss, overwriting, purging, deletion, or destruction, you should confer with Plaintiff to seek to resolve the issue consistent with the Federal Rules of Civil Procedure, Local Rules, Local Patent Rules and orders to the Court.

5. These discovery requests are deemed to be continuing in nature and, to the extent required by the Federal Rules of Civil Procedure, you must supplement your responses with information or documents that may become known or available after the date of your initial response.

C. Interrogatories

INTERROGATORY NO. 1

Since January 1, 2024, identify every Apple employee who has performed job duties within the Eastern District of Texas including every location where they worked within the Eastern District of Texas, the dates they worked at each location, how many hours they worked at each location on each date, and the work they performed at each location on each date.

INTERROGATORY NO. 2

Since January 1, 2024, identify every Best Buy employee within the Eastern District of Texas who is a Product Specialist and/or AEP Participant (as those terms are used in the Apple Best Buy Agreements) and describe in detail all documents (e.g., Merchandising Guidelines, marketing documents, training manuals, etc.) provided by Apple to that person and all training or courses (e.g., “on-site engagement sessions,” “offsite engagement sessions,” “virtual engagement sessions,” “online courses,” etc.) provided by Apple to that person.

INTERROGATORY NO. 3

Since January 1, 2024, for each Apple Shop at Best Buy in the Eastern District of Texas, provide its address, when it began operation, what type of Apple Shop it is (e.g., “Apple Shop 2.0,” “Apple Shop 3.0,” etc.), and describe in detail all activities that have taken place there (including, e.g., engagement sessions, product demonstrations, etc.).

INTERROGATORY NO. 4

Since January 1, 2024, for each Apple Shop at Best Buy in the Eastern District of Texas, identify and describe all things of value exchanged between Apple and Best Buy in connection with that Apple Shop, including, for example: (1) cash payments (e.g. “funding” or reimbursement obligations under the Apple Best Buy Agreements); (2) fixtures and hardware; (3) training and courses; and (4) repairs, maintenance, and upgrades.

DATED: September 8, 2025

Respectfully submitted,

/s/ Alden G. Harris

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**ATTORNEYS FOR PLAINTIFFS WAPP
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on September 8, 2025.

/s/ Alden G. Harris
Alden G. Harris