

3. 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.

4. 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.

5. 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.

6. 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.

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

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

9. 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.

10. “Best Buy” means all Best Buy entities with whom Apple has any agreements or contracts.

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. You are requested to produce not only those documents in your possession, custody or control, but also those documents reasonably available to you, including those in the possession, custody, or control of your attorneys, consultants, agents, employees, or other persons acting on your behalf.

2. If You claim that the attorney-client privilege, the work-product doctrine, or any other privilege is applicable to any document the production of which is sought by this request, You shall, with respect to that document:

- a. state the date of the document;
- b. identify each and every author of the document;
- c. identify each and every other person who prepared or participated in the preparation of the document;
- d. identify each and every person who received the document;
- e. identify each and every person from whom the document was received;
- f. state the present location of the document and all copies thereof;
- g. identify each and every person having custody or control of the document and all copies thereof; and
- h. provide sufficient further information concerning the document and the circumstances thereof to explain the claim of privilege and to permit the adjudication of the propriety of that claim.

3. Documents should be produced in the order they are kept in the ordinary course of business, and shall be produced in their original folders, binders, covers, or containers, or facsimile thereof, where applicable.

4. Documents attached to each other should not be separated.
5. Documents should be produced in such fashion as to identify the department, branch, or office in which they were located and, where applicable, the natural person in whose possession they were found, and the business address of each document's custodian(s).
6. Electronically stored documents should be produced in their original form, along with all metadata.
7. Each objection should be stated with specificity and should indicate whether documents are being withheld on the basis of that objection. An objection to part of a request must specify the part and permit inspection of the rest. *See* Fed. R. Civ. P. 34(b)(2)(C).
8. You must preserve 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 of the Court.
9. 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 your initial response.

C. Requests for Production

REQUEST NO. 1

All documents referenced or incorporated in the Apple Best Buy Agreements (including Design Kits, Merchandising Guidelines, and engagement reports) that relate to an Apple Shop at Best Buy in the Eastern District of Texas.

REQUEST NO. 2

Design Kits and Merchandising Guidelines, or their equivalents, for the following Apple Store Locations:

- 8687 N Central Expy, Dallas, TX 75225
- 3101 Knox St, Dallas, TX 75205
- 13350 Dallas Pkwy, Dallas, TX 75240

REQUEST NO. 3

Documents and records showing the identity of Apple employees who have performed job duties within the Eastern District of Texas since January 1, 2024 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.

REQUEST NO. 4

Since January 1, 2024, documents and records showing all trainings or courses (e.g., “on-site engagement sessions,” “offsite engagement sessions,” “virtual engagement sessions,” “online courses,” etc.) provided by Apple to Best Buy employees in the Eastern District of Texas.

REQUEST NO. 5

Since January 1, 2024, documents showing the dollar value of all things of value exchanged between Apple and Best Buy in connection with Apple Shops at Best Buy in the Eastern District

of Texas, 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.

REQUEST NO. 6

Documents that show Apple’s reasons for its design choices in the Design Kits for Apple Shops at Best Buy, including, for example, documents that describe whether Apple designed its Apple Shops to look like Apple Stores.

REQUEST NO. 7

All briefing and attachments, discovery, hearing transcripts, and orders relating to venue in *Advanced Coding v. Apple*, No. 2:24-CV-00572-JRG and *Avant v. Apple*, No. 2:24-CV-0757-JRG.

DATED: September 8, 2025

Respectfully submitted,

/s/ Alden G. Harris

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**ATTORNEYS FOR PLAINTIFFS WAPP
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TECH CORP.**

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