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

PERCEPTIVE AUTOMATA LLC,	§	
	§	
Plaintiff,	§	
	§	**C.A. NO. 2:25-cv-742-JRG**
v.	§	
	§	
TESLA, INC.,	§	
	§	
Defendant.	§	
	§	

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS (NO. 1-6)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the applicable local rules and orders of the Court, Plaintiff Perceptive Automata LLC serves the following Interrogatories upon Defendant Tesla, Inc. Thirty days from service of this document, these interrogatories are to be answered fully and separately, in writing, and under oath, by an officer or agent of Defendant who is authorized to give answers on Defendant's behalf.

DEFINITIONS

Unless specifically indicated, or otherwise required by the context in which the terms and names are used, the following instructions and definitions shall apply:

1. "Tesla," "You," "Your," or "Defendant" means and refers to Tesla, Inc., and includes all of its current or former officers, directors, partners, associates, employees, staff members, agents, representatives, attorneys, and all other persons or entities acting or purporting to act on its behalf; as well as all of its foreign and domestic parents, subsidiaries, affiliates, divisions, and any other related entities with whom it has sufficient closeness, connection and practical interaction to allow it control over any such entity's Documents and information.

2. The term "Plaintiff" or "Perceptive" means Perceptive Automata LLC.

3. "Patents-in-Suit" means any and/or all of U.S. Patent No. 10,614,344 (the "'344 patent"), U.S. Patent No. 11,126,889 (the "'889 patent"), U.S. Patent No. 11,467,579 (the "'579 patent"), U.S. Patent No. 11,520,346 (the "'346 patent"), and 11,753,046 (the "'046 patent").

4. The term "Accused Product(s)" refers to all products identified in response to any of Interrogatory Nos. 1 - 3 as well as all of Your accused instrumentalities, components, systems, processes, services, systems, products identified as infringing any of the Patents-in-Suit (1) in Plaintiff's Complaint; (2) in Plaintiff's preliminary disclosures; (3) in Plaintiff's Infringement Contentions ("Infringement Contentions"); (4) in all supplements and/or amendments to the foregoing; or (5) all reasonably similar products.

5. The terms "and," "or," and "and/or" shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive.

6. The terms "any" and "each" shall be construed to include and encompass "all," "each and every," or "any one," whichever makes the interrogatory more inclusive.

7. The term “concerning” means in whole or in part, directly or indirectly, referring to, relating to, connected with, commenting on, responding to, showing, describing, analyzing, reflecting, and consulting.

8. The terms “describe” or “identify” mean the following:

i) As to a natural person: state the full name, present or last known complete residential and business address and phone number(s), the name of the current or last known employer, and such person's relationship to you. If the person is an entity, state the current name for the entity, its principal home office address and telephone number and the name of the natural person with whom most of the communications with such entity are made or the name of the natural person whom the party responding to this document believes would have personal knowledge regarding the information requested in this request.

ii) As to a document: state the type of document identified, its author(s) and their title or position, the date such document was created, the production or control number of the document (if any), the addressee(s) and their title or position, person(s) receiving a copy of their title or position, a general description of subject matter contained in such document, and the present location of such document.

iii) As to a conversation, communication, discussion, oral statement, interview, or meeting: state the date upon which it took place; identify each person who participated in it, witnessed it and/or overheard it; state what was said

by each such person, including the issues and matters discussed; and identify each document which describes or relates to it.

iv) As to an act, action, activity, omission or event: state the identity of each person who participated in such action, act, activity, omission or event; the date and place of such act, action, activity, omission or event in detail; and the identity of each person having knowledge of the act, action, activity, omission, or event.

9. The terms "Document" or "Documents" are used herein in their broadest sense as set forth in the Federal Rules of Civil Procedure. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both originals and copies, and all attachments and appendices, within Your possession, custody, or control. Without limiting the foregoing, the terms "Document" or "Documents" shall include all accounts; advertising literature; agreements; analytical records; appointment books or schedules; articles; audits; bank records or statement blueprints; books; books of account; booklets; brochures; bulletins; calendars; CD, DVD, and other optical-disk media; charts; checks; circulars; coding forms; communications (intra-or inter-company); computer files or storage (in a computer, computer disk, computer tape or otherwise); computer printouts; computer readable data; computer programs; contracts; copies; correspondence; data bases; diaries; disks; displays; drafts of any document; drawings; electronic mail (e-mail); envelopes; examinations; films; files; file folders; financial reports; flyers; forecasts; graphs; indices; instructions; instruction manuals or sheets; invoices; job requisitions; letter; license; log; magnetic media or sheet; magnetic media of any kind (including but not limited to disks, tapes, or other media) containing computer software with supporting indices, data, documentation, flow charts, comments, object code, source code, and computer programs relating

thereto; manuals; maps; memoranda; messages; minutes; three-dimensional models; magazines or other published material (or any clipping thereof); newspapers; notes (typewritten, handwritten, stenographic, recorded, or any other type); notebooks; notices; opinions; pamphlets; papers; periodicals or other publications; photographs; price lists; prints; printed circuit boards; promotional literatures; punch cards; purchase orders; questionnaires; receipts; records; recorded Read-Only-Memory (ROM); recordings (magnetic, electronic, videotape, or any other type); record requests; reports; slides; solicitations; statements; statistical compilations; stenographic notes; studies; summaries (Including any memoranda, minutes, notes, records, or summary of any (a) telephone or intercom conversation or message, (b) personal conversation or interview, or (c) meeting or conference); supporting documentation; surveys; tapes; telegrams; telephone logs; transparencies; travel or expense records; video recordings; video tapes; visitor logs; voice recordings; vouchers; x-ray films and prints; worksheets; working papers; writings or other handwritten, printed, reproduced, recorded, typewritten, or otherwise produced graphic material from which the information required may be obtained. The words "Document" and "Documents" also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.

10. The term "Person" shall be broadly construed to include natural persons, as well as corporations, partnerships, unincorporated associations, joint ventures, sole proprietorships, or any other entity or organization of individuals.

11. The term "including" shall not be construed as limiting in any respect and shall mean the same as "including, but not limited to".

12. The terms "Litigation" or "Lawsuit" refer to Perceptive's lawsuit for the

infringement of the Patents-in-Suit in the United States District Court for the Eastern District of Texas, Case No. 2:25-cv-00742-JRG.

13. The term "License Agreement" means any agreement whereby You either gain access to, or use of, the patents, other intellectual property, products or technology of another, or grant access to or use of Your patents, other intellectual property, products or technology to another, whether draft or executed, regardless of form or title.

14. The terms "relating to," "relate(s) to," or "related to" mean, in addition to their customary and usual meanings, discussing, referring, pertaining, reflecting, showing, recording, or having any logical or factual connection whatever with the subject matter in question.

15. The plural of any word herein includes the singular, and the singular includes the plural. Use of the singular shall also include the plural, and vice-versa.

16. The past tense of a verb used herein includes the present tense, and the present tense includes the past tense.

INSTRUCTIONS

1. For the following interrogatories, the information sought is that which is current to the date of Your response. The following interrogatories are continuing in nature, and supplemental and/or corrected responses are required in accordance with Federal Rule of Civil Procedure 26(e) should You learn any response was incomplete or incorrect when made, or, although complete and correct when made, it is no longer complete and correct.

2. If any information is withheld on the basis of a claim of privilege or work product, then the answer shall: (a) identify the information withheld by subject matter, author(s), addressee(s), and recipient(s); (b) state the basis for withholding the information; and (c) identify the person(s) knowledgeable about the subject matter of the withheld information.

3. If, in responding to any of these Interrogatories, You rely on documents that You have not previously produced in this litigation, You are requested to produce the documents and identify such documents relied upon in responding to a particular interrogatory. If any Documents referenced in Your response to these interrogatories were, but are no longer, in Your possession, custody, or control, state what disposition was made of them, when it was made, the reasons for the disposition, and the current custodian of such Documents. If any Documents referenced in response to these interrogatories have been lost or destroyed, describe in detail the circumstances of such loss or destruction and identify each lost or destroyed Document (and all files that contained such Documents).

4. If the procedure for answering interrogatories as authorized by Federal Rule of Civil Procedure 33(d) is used, for each interrogatory and subpart thereof, specify the production (i.e., Bates) numbers of the specific Document or groups of Documents.

5. If You object to any interrogatory or any subpart of any interrogatory, Your answer must state the objection and any grounds, and You must answer the parts of the interrogatory not subject to Your objection.

6. All of these Interrogatories must be answered fully and in writing in accordance with Federal Rules of Civil Procedure 33 and be signed by You. If any of the interrogatories cannot be answered in full after exercising reasonable diligence to secure a response, please so state, provide the reasons why the interrogatory cannot be answered fully, supply the portions that can be answered, and supply whatever information is available regarding any portions that cannot be answered.

INTERROGATORIES

INTERROGATORY NO. 1

Identify all devices made, sold, offered for sale, used, or imported in or into the United States by You or on Your behalf, at any point since July 2019, that include, implement, use, perform, or incorporate Full Self-Driving as described in Exhibits A-E to Plaintiff's Infringement Contentions. For the purposes of this interrogatory, such identification should include the year, model, and other version or identifying information for the vehicle, and/or the FSD version, any model number(s) and/or internal identifiers or code names associated with the vehicle, and the date the vehicle was first made, sold, offered for sale, used or imported in or into the United States.

INTERROGATORY NO. 2

State with particularly the circumstances surrounding Your first awareness of each of the Patents-in-Suit and any patent or application (foreign or domestic) related to the Patent-in-Suit, including for each such patent or application, the date when You first became aware of the patent or application, the Persons involved in the circumstances and events when You first became aware of the patent or application, the identity and content of any communications or documents relating to Your awareness of the patent or application, any third-party(ies) You contacted regarding the patent or application, and all actions taken by You relating to, or as a result of, Your becoming aware of the patent or application.

INTERROGATORY NO. 3

Identify (and include a job title) of the five most knowledgeable Persons at Tesla residing in, or working in, Texas Related to: (1) the technical aspects of the FSD, including, but not limited to, the FSD source code and other technical aspects; and (2) the financial aspects of the FSD,

including, but not limited to, the projected revenues and profits, as well as internal and external valuations of the FSD.

INTERROGATORY NO. 4

State with specificity the basis for, and all facts and circumstances supporting or otherwise relating to, each defense and counterclaim asserted by You in this litigation, including the identification of all Persons with knowledge relevant to each such defense and counterclaim and the identification of all documents and evidence supporting such alleged defenses and/or counterclaims.

INTERROGATORY NO. 5

State and describe all facts related to any alleged non-infringing alternatives/substitutes and/or allegedly acceptable non-infringing alternatives/substitutes available to You during the relevant timeframe, including, but not limited to, (a) the non-infringing alternative/substitute; (b) why such non-infringing alternative/substitute was acceptable (including, but not limited to, acceptability to You and/or Your customers); (c) the costs associated with such non-infringing alternative/substitute; (d) the availability of such non-infringing alternative/substitute (including where it was available and when it was available); and (e) all Persons with knowledge of such non-infringing alternative/substitute.

INTERROGATORY NO. 6

Identify all source code, technical manuals, operating manuals, technical specifications, circuit diagrams, design drawings, source code, product proposals, functional requirements, design requirements, technical reports, laboratory or engineering notes, meeting minutes, schematics, flow charts, and bills of materials produced in this case and the five Persons Most knowledgeable about such information. For the purposes of this interrogatory, such identification should include

the Accused Product to which each such item relates, the Bates ranges for each such items, as well as the file path on the source code computer for any such materials.

Dated: November 18, 2025

Respectfully submitted,
/s/ C. Austin Ginnings

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via email on November 18, 2025.

/s/ C. Austin Ginnings