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

MASSIVELY BROADBAND LLC, *Plaintiff*, v. SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., *Defendants*.	Case No. 2:25-cv-00608 **JURY TRIAL DEMANDED**

DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF (NOS. 1-18)

Pursuant to Federal Rule of Civil Procedure 33 and the Patent Local Rules of the U.S. District Court for the Eastern District of Texas, Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung" or "Defendants") hereby request that Massively Broadband LLC ("Massively Broadband" or "Plaintiff") respond to the following First Set of Interrogatories in writing and under oath, within thirty days of service of this request pursuant to Federal Rule of Civil Procedure Rule 33(b) or at such other time and place as counsel for the parties may agree.

To the extent that any of these interrogatories may at any time be supplemented, changed, or otherwise affected by information acquired by Massively Broadband subsequent to the service of its answers, Samsung directs Massively Broadband to promptly service supplemental answers reflecting such changes pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The following definitions shall apply to each of the Interrogatories herein:

1. "Massively Broadband", "you", and/or "your" means Massively Broadband LLC and any of its officers, directors, current and former employees, counsel, agents, consultants,

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representatives, and any other persons acting on behalf of any of the foregoing, and any affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by Massively Broadband, and all predecessors and successors in interest to such entities.

2. "Defendants," "Defendant," and/or "Samsung" means each of Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., individually and/or collectively.

3. The "'194 Patent" means U.S. Patent No. 7,676,194;

4. The "'754 Patent" means U.S. Patent No. 8,923,754;

5. The "'337 Patent" means U.S. Patent No. 9,667,337;

6. The "'999 Patent" means U.S. Patent No. 10,224,999;

7. The "'783 Patent" means U.S. Patent No. 10,797,783;

8. The "'763 Patent" means U.S. Patent No. 8,350,763;

9. The "'358 Patent" means U.S. Patent No. 8,593,358;

10. The "'625 Patent" means U.S. Patent No. 11,063,625;

11. The "'548 Patent" means U.S. Patent No. 11,876,548;

12. The "'794 Patent" means U.S. Patent No. 8,224,794;

13. The "'925 Patent" means U.S. Patent No. 8,515,925;

14. The "'700 Patent" means U.S. Patent No. 8,725,700;

15. The "Intelligent Wireless Broadband Relay Patents" means the '194, '754, '337, '999, and '783 Patents, individually and collectively.

16. The "Smart Antenna Patents" means the '763, '358, '625, and '548 Patents, individually and collectively.

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17. The "Network Monitoring Patents" means the '794, '925, and '700 Patents, individually and collectively.

18. "Patents-in-Suit" refers to the '194, '754, '337, '999, '783, '763, '358, '625, '548, '794, '925, and '700 Patents. individually and collectively.

19. "Product" means a machine, manufacture, apparatus, device, instrument, mechanism, appliance, or an assemblage of components/parts (either individually or collectively) that are designed to function together electronically, mechanically, chemically, or otherwise, including any offered for sale, or under development.

20. "Samsung Accused Products" refers to the products, devices, apparatuses, and instrumentalities as defined by Massively Broadband in the complaint and infringement contentions.

21. "3GPP" means 3rd Generation Partnership Project.

22. "ETSI" means European Telecommunications Standards Institute.

23. "IETF" means Internet Engineering Task Force.

24. "IEEE" means Institute of Electrical and Electronics Engineers.

25. "IPR" means intellectual property rights as defined in the ETSI's "Rules of Procedure," titled the "ETSI Intellectual Property Rights Policy" and IEEE.

26. The term "FRAND" means "fair, reasonable, and non-discriminatory" as those terms are used by SSOs, including but not limited to ETSI and IEEE in the context of IPR licensing.

27. "Essential" means necessary for implementation of any mobile wireless standard, such that the standard, or some part of the standard, could not be practiced without infringing the patent or technology to which "essential" refers.

28. "Named inventor" means each inventor named on the Patents-in-Suit.

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29. "Standards" and "relevant standards" mean any and all public scientific or technical standards that relate to the subject matter of the Patents-in-Suit, including but not limited to standards published by ETSI, 3GPP, IEEE, and similar organizations.

30. "Standards setting organization" and "SSO" mean an organization that adopts standards governing an industry or technological field, and includes without limitation ETSI, 3GPP, and IEEE.

31. "Related Patents" means any and all patents, patent applications and/or patent publications concerning subject matter similar to the claimed subject matter of the Patents-in- Suit (including but not limited to the standards to which Massively Broadband alleges any such patent to be related); by way of example only, "related patents" includes any patent document that (i) claims priority from any of the Patents-in-Suit, (ii) is identified as priority for any of the Patents-in-Suit, or (iii) claims priority to any application to which any Patents-in-Suit claims priority.

32. The terms "researcher" and "researchers" mean any person who, alone or in concert with others, contributed to or investigated the technology disclosed or claimed in the Patents-in-Suit, or who contributed to or published any document before the issue date of the Patents-in-Suit concerning subject matter similar to the claimed subject matter of the Patents-in-Suit.

33. "Document" includes, without limitation, all written, graphic or otherwise recorded material, including without limitation, microfilms or other film records or impressions, electronically stored information regardless of the form of storage medium, tape recordings or computer cards, floppy disks or printouts, any and all papers, photographs, films, recordings, memoranda, books, records, accounts, communications, letters, telegrams, correspondence, notes of meetings, notes of conversations, notes of telephone calls, inter-office memoranda or written communications of any nature, recordings of conversations either in writings or upon any

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mechanical or electrical recording devices, including email, notes, papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings, time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone bills, logs, and any differing versions of any of the foregoing, whether so denominated, formal, informal or otherwise, as well as copies of the foregoing which differ in any way, including by the addition of handwritten notations or other written or printed matter of any nature, from the original. The foregoing specifically includes information stored in a computer database and capable of being generated in documentary form, such as electronic mail. The foregoing specifically includes source code stored in a computer database and capable of being generated in documentary form, such as a text file.

34. "Source Code" means computer code that specifies software that executes on processors (including but not limited to CPUs, embedded processors, DSPs, microcontrollers, FPGAs), or on processors of a computer or server (including but not limited to code written in the C, C++, C#, Objective C, Visual Basic, Java, JavaScript, PHP programming languages, in assembly language, in mark-up languages such as HTML or XML, or in data object formats such as JSON), or hardware definition/design language code that specifies the structure or functionality of hardware logic.

35. "Enabling disclosure" shall refer to the requirement that "[t]he specification shall contain a written description of . . . the manner and process of making and using [the invention], in such full, clear, concise, and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same . . ." as set forth in 35 U.S.C. §112(a).

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36. "Best mode" shall refer to the requirement that "[t]he specification shall contain a written description of . . . the best mode contemplated by the inventor of carrying out his invention . . . " as set forth in 35 U.S.C. §112(a).

37. "Communication" means, without limitation, any transmission, conveyance or exchange of a word, statement, fact, thing, idea, document, instruction, information, demand or question by any medium, whether by written, oral or other means, including but not limited to, electronic communications and electronic mail.

38. The term "person" refers to any individual, corporation, proprietorship, association, joint venture, company, partnership or other business or legal entity, including governmental bodies and agencies.

39. "Infringe" and "infringement" means direct infringement, contributory infringement, infringement by inducement, literal infringement, and infringement by the doctrine of equivalents or the reverse doctrine of equivalents.

40. "Prior art" means, as of the filing date of the Patents-in-Suit, any article, poster, abstract, chapter, display, slides, or other printed publication that discloses, or a use, sale, or offer for sale of a system or device disclosed or claimed in the Patents-in-Suit or that practices or could be used to practice, the methods or portions of the methods disclosed or claimed in the Patents-in-Suit or any other thing or activity which could be or could have been relied on by the United States Patent Office or a Court for an anticipation or obviousness determination of the Patents-in-Suit, including any and all patents, patent applications and/or publications prepared before the filing date of the Patents-in-Suit.

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41. "Accused Feature" means the features of the Accused Products identified as infringing the Asserted Claims of the Asserted Patents as set forth in Your Infringement Contentions, to the extent any such feature is ascertainable in the Infringement Contentions.

42. "Identify" means:

(a) in relation to a person, his or her full name and:

(a) present business address(es), position and business affiliation, and business telephone number; or, if current information is not known, (b) the last known business and home addresses, position and business affiliation, and business telephone numbers;

(b) in relation to an entity, the entity's: (a) full name; (b) state of incorporation; (c) current or last known business address; and (d) current or last known telephone number;

(c) in relation to a document: (a) the date the document was created; (b) the author of the document; (c) the recipient of the document; (d) any person or entity receiving a copy of the document by "cc," "bcc," or otherwise; (e) a basic description of the nature of the document, including (if applicable) the title of the document, whether the document has been or is being produced in this litigation, and the dates or identifier number affixed to the document. Document to be "identified" include documents in Massively Broadband's possession, custody, or control, documents known by Massively Broadband to have existed but no longer exist, and other documents of which Massively Broadband has knowledge or information;

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(d) in relation to a product or service: (a) the product or service name; (b) the manufacturer, producer, or service provider; (c) the model, version, or part number; and (d) the type, description, or any other representative designation for the product or service;

(e) in relation to a communication: (a) the date of the communication; (b) the identity of all documents relating to such communications; (c) the content and substance of the communication; (d) the persons who made, received or were involved in the communication; and (e) the person or persons most knowledgeable about the communication.

43. "Reflect," "reflecting," "relate to," "refer to," "relating to," and "referring to" mean relating to, referring to, concerning, mentioning, reflecting, pertaining to, evidencing, involving, demonstrating, describing, discussing, commenting on, comprising, embodying, responding to, supporting, contradicting, containing or constituting (in whole or in part), as the context makes appropriate.

44. The terms "third party" and "third parties" refer to persons that are not a party to this Action.

45. The words "and" and "or," as used herein, shall be construed either conjunctively or disjunctively, as required by the context, to bring within the scope of these interrogatories any information which might be deemed outside their scope by any other construction.

46. The term "including," as used herein, shall mean "including without limitation."

47. As used herein, the term "facts" shall have its ordinary meaning and, pursuant to Federal Rule of Civil Procedure 33(a)(2), also shall mean related opinions, related contentions, and the application of law to fact.

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48. Except as specifically provided herein, words imparting the singular shall include the plural and vice versa.

INSTRUCTIONS

The following instructions shall apply to each of the Interrogatories herein:

1. All Interrogatories are to be understood as requesting information in the possession, custody, or control of Massively Broadband.

2. In answering the following Interrogatories, Massively Broadband shall furnish all available information, including information in the possession, custody, or control of any of Massively Broadband's attorneys, directors, officers, agents, employees, representatives, associates, investigators or division affiliates, partnerships, parents or subsidiaries, and persons under Massively Broadband's control, who have the best knowledge, not merely information known to Massively Broadband based on Massively Broadband's own personal knowledge. If you cannot fully respond to the following Interrogatories after exercising due diligence to secure the information requested thereby, so state, and specify the portion of each Interrogatories that cannot be responded to fully and completely. In the latter event, state what efforts were made to obtain the requested information and the facts relied upon that support the contention that the Interrogatories cannot be answered fully and completely, and state what knowledge, information or belief Massively Broadband has concerning the unanswered portion of any such Interrogatories.

3. If any information requested is claimed to be privileged or otherwise immune from discovery, please provide all information falling within the scope of the Interrogatory which is not privileged, and for each item of information contained in a document or communication to which a claim of privilege is made, identify such document or communication with sufficient particularity for purposes of a motion to compel, such identification to include at least the following:

(a) the basis on which the privilege is claimed;

(b) the names and positions of the author of the information;

(c) the name and position of each individual or other person to whom the information, or a copy thereof, was sent or otherwise disclosed and, if not apparent, the relationship of the persons to the author of the information;

(d) the date of the information;

(e) a description of any accompanying material transmitted with or attached to such information;

(f) the number of pages in such document or information or length of communication; and

(g) a description of the subject matter of the information, including whether any business or non-legal matter is contained or discussed in such information.

4. If Massively Broadband's response to a particular Interrogatory is a statement that Massively Broadband lacks the ability to comply with that Interrogatory, Massively Broadband must specify whether the inability to comply is because the particular item or category of information never existed, has been destroyed, has been lost, misplaced, or stolen, or has never been, or is no longer, in Massively Broadband's possession, custody, or control, in which case the name and address of any person or entity known or believed by you to have possession, custody, or control of that information or category of information must be identified.

5. Massively Broadband's obligation to respond to these Interrogatories is continuing and its responses are to be supplemented to include subsequently acquired information in accordance with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

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INTERROGATORIES

INTERROGATORY NO. 1:

Describe in detail on an element-by-element basis your contention regarding the conception and reduction to practice of each and every asserted claim of the Patents-in-Suit and state all factual and legal bases corroborating such contention, including the date and location of first conception and reduction to practice of each claim of the Patents-in-Suit, when, where, and to whom the invention was first disclosed, all persons who participated in such conception and reduction to practice, a description of each person's specific contributions, role, and participation in such conception and reduction to practice, and all persons having knowledge of such conception, diligence, and/or reduction to practice, and identify all documents (by Bates number) that you contend support your answer.

INTERROGATORY NO. 2:

Separately, for each asserted claim of the Patents-in-Suit, describe in detail (i) the first manufacture, use, public use, offer for sale, sale, and importation of the alleged claimed invention and (ii) the first publication and/or public disclosure of the alleged claimed invention(s), including without limitation the nature of such event or disclosure (e.g., public use, publication, offer for sale, sale), the date and location of such disclosure, the persons with knowledge and/or involvement in such disclosure, and the documents related to such disclosure, and identify the Persons most knowledgeable of the facts forming the basis of this response.

INTERROGATORY NO. 3:

Identify all efforts (regardless of success) to license, negotiate a license, enter into a settlement agreement, or otherwise negotiate or enter into any agreement (including but not limited to any license, sublicense, assignment, covenant not to sue, cross-license, or other conveyance of rights) related to the Patents-in-Suit, including any such agreement that would cover one or more

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of the Patents-in-Suit, and including efforts by any inventor or previous owner of any of the Patents-in-Suit or by Massively Broadband and any of Massively Broadband's agents, employees, officers or directors thereof, and identify the licensee or party to the negotiation, license, agreement, or other communication, and the Persons most knowledgeable about these facts.

INTERROGATORY NO. 4:

For each of the Patents-in-Suit, describe in detail the inventors' and/or other individuals or entities' participation in and contributions to ETSI, IETF, 3GPP, IEEE, or other industry working groups relating to the subject matter of the Patents-in-Suit, including, for example, any contributions or proposals to ETSI, IETF, 3GPP, or IEEE working groups relating to the Patents-in-Suit, Related Patents, or applications, whether those proposals were adopted or not, and communications related to those proposals; the circumstances of the first disclosure, if any, of the Patents-in-Suit, Related Patents, or related patent applications to ETSI, IETF, 3GPP, or IEEE or other industry working groups; the decision as to whether and when to file any IPR Information Statement and Licensing Declaration; the identification of all persons involved in these activities or decisions, and a description of each person's role and participation in the decision making and disclosure process; and the identification of all related documents (by Bates number).

INTERROGATORY NO. 5:

For each claim of each of the Patents-in-Suit, state your contention on whether practice of the claim is essential for compliance with any aspect of one or more Standards (including those developed and/or published by ETSI, 3GPP, or IEEE), and describe the complete factual and legal bases for your contention of essentiality or non-essentiality, including (i) for any contention of essentiality, identifying the specific portion or portions of the relevant standard or standards that you contend require practice of the claim, and a claim chart mapping said portions to each

claim limitation; (ii) for any contention of non-essentiality, explaining in detail how the Samsung Accused Products can comply with the Standards without practicing such claim; (iii) identifying all documents on which you rely to support your contention; and (iv) identifying the Persons most knowledgeable about the facts supporting your contention.

INTERROGATORY NO. 6:

State whether you contend there are secondary considerations that should be considered by the Court in connection with its determination pursuant to 35 U.S.C. § 103 of the validity of each asserted claim of the Patents-in-Suit, and if the answer is anything other than an unqualified negative for any asserted claim, identify for that claim each such secondary consideration and describe in detail Massively Broadband's contentions as to why each such secondary consideration demonstrates obviousness or non-obviousness and all facts in support thereof, including but not limited to any documents in support of such facts, testimony from past cases in support of such facts, and an identification of the Persons most knowledgeable of the facts forming the basis of this response. Your description shall include the factual and legal bases concerning how each objective indicia of non-obviousness supports patentability, as well as the nexus between each Patent-in-Suit and each such indicia.

INTERROGATORY NO. 7:

State in complete detail all financial remedies, including any claim for damages in the form of lost profits or a reasonable royalty, to which you contend you are entitled in this case, including without limitation all factual, legal, and evidentiary bases for such contention and a detailed description of how such damages have been calculated, including identifying the relevant damages period you contend is applicable for each Asserted Patent, any profits you contend you lost, the form of royalty you contend is appropriate, the date of any hypothetical negotiation you contend

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is applicable, any royalty rate you contend should apply, the royalty base you contend it should be applied to, the factors by which you calculated that royalty rate, whether you contend the Entire Market Value Rule should apply, and the basis for your contentions, and including your assessment of the factors set forth in *Georgia Pacific Corp. v. United States Plywood Corp.*, 318 F. Supp. 1116 (S.D.N.Y. 1970), the factors by which You determined the royalty base to which the rate should be applied, and any FRAND obligations relevant to Massively Broadband's damages, and if Massively Broadband seeks increased damages under 35 U.S.C. §284, ¶ 2, every factual and legal basis for that contention, and identify all documents that contain information regarding your damages contentions and persons with knowledge regarding your damages contentions.

INTERROGATORY NO. 8:

Separately for each of the Patents-in-Suit, identify all Prior Art known to You, including when You first learned about each piece of Prior Art and a detailed description of all non-privileged communications (including any response thereto), either written or oral, within Massively Broadband or with any third party, that allege or discuss the Prior Art or otherwise the invalidity or unenforceability of each of the Patents-in-Suit; any invalidity chart(s) included in the communication; each limitation of each claim of each of the Patents-in-Suit alleged to have been found in the prior art; any specific combination or combinations of prior art that any persons contended rendered the claim obvious to one of ordinary skill; any motivation to combine related thereto; any basis for unenforceability; all documents relating or referring to the communication; and all persons with knowledge of such communications. For the avoidance of doubt, Your Response should necessarily identify the results of any prior art searched commissioned by Massively Broadband, its agents, or any other Person related to the Patents-in-Suit or any related patent or application.

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INTERROGATORY NO. 9:

Separately for each asserted claim of the Patents-in-Suit, describe in detail each process, method, product, device, apparatus, act, or other instrumentality of Massively Broadband, or any licensee(s) that practices, incorporates, or reflects that claim, including the name (including any code name), model number, and all other designations or descriptions used to identify such process, method, product, device, apparatus, act, or other instrumentality, whether formal or informal, current or past.

INTERROGATORY NO. 10:

Describe any and all efforts or actions made by Massively Broadband before the filing of this Action to place Samsung on actual notice of its alleged infringement of the Patent-in-Suit, and identify all relevant documents and persons with knowledge thereof.

INTERROGATORY NO. 11:

Describe Massively Broadband's past and present corporate organizational structure, including (a) the identity of all past and present incorporators, shareholders, parents, subsidiaries, predecessors in interest, successors in interest, and affiliates, including when such relationships began and how long they lasted; (b) the identity and current location of all past and present incorporators, officers, directors, agents, or employees; (c) all agreements between Massively Broadband and/or any Person who has or previously held a financial, ownership, or other interest in Massively Broadband or in the Patents-in-Suit; and (d) any other agreements related to the Patents-in-Suit, or any application and/or patent related to the Patents-in-Suit. Your response should identify all evidence by production number supporting Your responses to the foregoing and identify the persons most knowledgeable about the foregoing.

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INTERROGATORY NO. 12:

Separately for each Asserted Claim of the Patents-in-Suit, (a) identify each Person Massively Broadband contends is directly infringing, and for each such Person describe all acts by Samsung that induce and/ or contribute to such direct infringement, and describe whether and how Samsung actually knew or willfully blinded itself to the fact that it was inducing and/or contributing to patent infringement by that Person; (b) describe where each element, limitation, or step is found in each Samsung Accused Product or in its use; (c) identify all evidence by production number supporting Your responses to the foregoing; and (d) identify the persons most knowledgeable about the foregoing.

INTERROGATORY NO. 13:

Describe in detail all financial transactions involving the Patents-in-Suit (including without limitation any license to the Patents-in-Suit, Massively Broadband's acquisition of the Patents-in-Suit, and any prior sale or acquisition of the Patents-in-Suit), including all dates relevant to each such transaction, the factual circumstances surrounding negotiations of each such transaction, and the results of each such transaction, including for each successful transaction, a detailed description of the final arrangement (e.g., the arrangement resulting in assignment of the Patents-in-Suit to Massively Broadband) and consideration exchanged or expected to be exchanged in each such transaction,

INTERROGATORY NO. 14:

Identify any and all valuations of the Patents-in-Suit and for each such valuation, describe in detail the reasons for, circumstances regarding the performance of, and outcomes of that valuation.

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INTERROGATORY NO. 15:

Describe in detail, on a claim-by-claim basis, all the manners or techniques by which each Asserted Claim of the Asserted Patents improved upon the Prior Art, added functionality that did not exist in the Prior Art, overcame technical challenges found in the Prior Art or the failure of others, or provided an incremental benefit over the Prior Art, including for each such claimed improvement, added functionality, or incremental benefit, an identification of whether You contend it was a non-obvious or unpredictable improvement, addition of functionality, or incremental benefit, and why, and all facts in support thereof, including but not limited to all Documents in support of such facts and any Persons with knowledge of these facts.

INTERROGATORY NO. 16:

For each of the Accused Features, state whether You contend that the Accused Feature forms the basis of customer demand for the Accused Products, and, if so, Identify all facts and Documents supporting this claim.

INTERROGATORY NO. 17:

For each limitation of each asserted claim of the Patents-in-Suit that Samsung identified in its invalidity contentions as failing to comply with 35 U.S.C. §112, identify, in claim chart form, all evidence, including portions of the specification, that you contend provide written description support and/or an enabling disclosure.

INTERROGATORY NO. 18:

Separately for each asserted claim of each of the Asserted Patent, to the extent that Massively Broadband contends that the claim is valid under 35 U.S.C. § 102 and/or § 103, explain in detail all factual and legal bases for Massively Broadband's validity contention(s). For each such claim, to the extent that You disagree with any of Samsung's invalidity contentions in whole

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or in part, please include in Your answer a point-by-point rebuttal of Samsung's invalidity contentions, including without limitation an identification of each element that You contend is missing from the Prior Art reference(s) cited in Samsung's invalidity contentions, and every reason why You contend that the claim is not obvious over the Prior Art cited in Samsung's invalidity contentions (including any contentions based on secondary considerations of non-obviousness, as well as the nexus between each Asserted Patent and each such indicia).

Dated: October 21, 2025

By */s/ Sean Pak*

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Counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing document was served on counsel for plaintiff Massively Broadband LLC via electronic delivery on October 21, 2025.

/s/ Chunmeng Yang

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