

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

COGMEDIA LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Civil Action No. 1:25-cv-12127

**DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION (NOS. 1-59)
TO PLAINTIFF COGMEDIA LLC**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules for the District of Massachusetts, Defendant Meta Platforms, Inc., (“Defendant” or “Meta”) requests that Plaintiff Cogmedia LLC (“Plaintiff” or “Cogmedia”) respond to the following Requests for Production (“Requests”) within thirty (30) days from the date of service thereof, applying the Instructions and Definitions set forth herein. Plaintiff shall supplement all responses to these Requests as required by the Federal Rules of Civil Procedure.

DEFINITIONS

1. “You,” “Your,” “Plaintiff,” or “Cogmedia” means (i) Plaintiff Cogmedia LLC, (ii) its present or former directors, principals, owners, members, officers, employees, agents, representatives, accountants, investigators, consultants, attorneys, and predecessors or successors in interest, and any parent, subsidiary, joint venture, affiliated entities or other legal entities that are wholly or partially owned or controlled, either directly or indirectly, that were in existence during the applicable period of time covered by these Requests; (iii) any other Person acting on their behalf or on whose behalf

they acted; and (iv) any other Person otherwise subject to their control, or which controls them, or with which they are under common control.

2. “Defendant” or “Meta” means Meta Platforms, Inc.

3. “Party” or “Parties” refer to the Defendant and the Plaintiff.

4. “Action” means the case captioned as *Cogmedia LLC v. Meta Platforms, Inc.*, No. 1:25-cv-12127 in the District of Massachusetts, and any appeals thereof.

5. “Complaint” means the Complaint for Patent Infringement filed by Cogmedia LLC in this Action on July 30, 2025, as well as any supplements thereof or amendments thereto.

6. “’371 Patent” means U.S. Patent No. 11,036,371—including any reexamination certificate and certificate of correction.

7. “’562 Patent” means U.S. Patent No. 9,817,562—including any reexamination certificate and certificate of correction.

8. “’141 Patent” means U.S. Patent No. 10,664,141—including any reexamination certificate and certificate of correction.

9. “Asserted Patents” or “Patents-in-Suit” mean the ’371 Patent, the ’562 Patent, and the ’141 Patent.

10. “Related Application” means any parent or ancestral application related in any way to the Asserted Patents and any continuing application, continuation-in-part application, divisional application, file-wrapper continuation, reexamination proceeding, reissue application, abandoned application, or foreign counterpart application for that patent.

11. “Related Patent” means any patent that issued from any Related Application, including any patent that may have been opposed, re-examined, re-issued, or subjected to any validity or nullity proceeding.

12. “Prior Art” has the same meaning as it has in the applicable version of 35 U.S.C. §§ 102 and/or 103. This meaning includes any patent, printed publication, physical product or component, prior knowledge, prior use, prior sale or offer for sale, or other act or event defined in 35 U.S.C. §§ 102 and/or 103, taken alone or in combination.

13. “Named Inventor” shall mean any person listed as an inventor on the face of any of the Asserted Patents.

14. “Third Party” means any person or entity other than Cogmedia and Meta.

15. “Document” is used in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure, and includes but is not limited to all of the following matter in Your actual or constructive possession, custody, or control: all written, handwritten, typewritten, drawn, graphic, printed, recorded, magnetic, optical, electronic, or otherwise produced or reproduced matter or medium of any kind on which any intelligence or information is recorded or stored, or from which any intelligence or information can be obtained, translated, if necessary, by Cogmedia through detection devices into reasonably usable form. “Document” includes but is not limited to the original and any non-identical copy, whether different from the original because of any notes, marks, alterations, writings, or other changes made on said copy or otherwise. By way of example, and not by way of limitation, “Document” includes any advertising literature; agreement; archive record; bank record or statement; blueprint; book; book of account; booklet; brochure; calendar; chart; check; circular; coding form; communication (including without limitations intra- or inter-company communication); compilation; computer printout; computer-readable form; computer software and firmware, including supporting indices, data, documentation, flow charts, comments, object code, source code, and computer programs relating thereto; contract; copy; correspondence (including without limitation cablegrams, radiograms,

telegrams, and telefaxes); data (in any form); database; diary; direction; display; draft of any document; drawing; e-mail or electronic mail; file (whether current or expired); film; flyer; forecast; form; graph; handbook; history; index; information that has been stored, recorded, or transmitted electronically (including but not limited to voicemail, video mail, and electronic mail, and information stored or recorded on, or transmitted by, cellular telephones, smartphones, or other communication devices, personal digital assistants or other handheld computers, home or business computers, desktop computers, laptop computers, mainframe computers, notebook computers, personal computers, networked or stand-alone computers, or Internet websites); instruction; instruction book, booklet, manual, or sheet; invoice; job requisition; ledger; legal pleadings or filings of any kind; letter; license; machinery manual; magazine; magnetic media of any kind (including but not limited to disks, floppy disks, tapes, back-up tapes, or other media containing computer software, firmware, or data of any kind); manual; map; memorandum; minutes or other records of meetings, conferences, or telephone or intercom conversations, including lists of persons attending the meetings, conferences or conversations; newsletter; newspaper or other clipping; note; notebook (including but not limited to laboratory, engineering, or other notebooks); operator manual; opinion; optical disc or other optical medium of any kind containing computer software, firmware, or data of any kind; pamphlet; paper; patent, patent application, periodical or other publication; phonorecord; photograph (whether digital or analog); portfolio; PowerPoint presentation or any portion thereof; press release; price list; print; printed circuit board; project history; promotional literature; proposal; quotation; receipt; record; recorded Read-Only Memory (ROM); recording; report; sales literature; schematic; server log; sketch; slide; solicitation; spreadsheet; statement; statistical compilation; stenographic notes; study; summary (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); telephone log; test results; text; transparency; travel or expense report or record; video mail; video recording; video tape; voice mail; voice recording; voucher; work paper or worksheet; written contract, license, or sales agreement; written offer for purchase or sale; and any other written or documentary material of any nature.

16. “Communication” and “Communications” shall mean any transmission of information by any means, including without limitation telephone conversations, letters, telegrams, teletypes, telexes, telecopies, facsimiles, computer linkups, wireless transmissions, written memoranda, electronic devices, voicemail, e-mail, and face-to-face conversations.

17. “Thing” or “Things” is used in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure, and includes, but is not limited to, objects of every kind and nature other than a Document. By way of example, and not by way of limitation, “thing” or “things” includes prototypes, models, specimens, and the like, and commercially manufactured items.

18. “Agreement” shall mean any contract, undertaking, promise, covenant, arrangement, or understanding, or other agreement of whatever kind or nature whatsoever, whether written or oral, including all supplements and additions, changes, amendments, and modifications therefor, and all cancellations, revocations, rescissions, and terminations thereof.

19. “Person” shall mean: (a) natural persons (also referred to as “individuals”); (b) business or legal entities, including, without limitation, corporations, partnerships, joint ventures, firms, associations, professional corporations, and proprietorships; and (c) governmental bodies or agencies.

20. “Address” shall mean the city, state, and country of the residence or place of

business. If the person or business has more than one Address, provide each.

21. “Discuss,” “concern” or “concerning,” “refer to,” and “relate to” or “relating to” shall mean, directly or indirectly, and in whole or in part, pertaining to, mentioning, commenting on, connected with, describing, analyzing, explaining, showing, reflecting, identifying, setting forth, dealing with, embodying, comprising, consisting of, containing, constituting, resulting from, recording, or in any way relevant to, a particular subject.

22. “Licensee” or “Assignee” means any entity with which Plaintiff has a license, assignment, covenant not to sue, or other understanding, written, oral or implied, that the entity has any rights to one or more of the Asserted Patents or Related Patents, may practice one or more claims of one or more of the Asserted Patents or Related Patents and/or that Plaintiffs will not file suit or otherwise enforce against that entity one or more claims of one or more of the Asserted Patents or Related Patents.

23. “Accused Products” refers to the products Cogmedia identifies in its Preliminary Infringement Contentions dated February 4, 2026.

24. “Related Actions” means any proceedings involving the Patents-in-Suit and/or Related Patents, including but not limited to *Inter Partes* Review Nos. IPR2026-00247; IPR2026-00248; and IPR2026-00249.

25. “EWall Project” or “EWall System” refers to the EWall (Electronic Card Wall) project and related technology developed at the Massachusetts Institute of Technology and/or under sponsorship of the Office of Naval Research, including all projects, systems, disclosures, software prototypes, modules, publications, presentations, and demonstrations thereof.

26. “EWall Contributors” are the Persons that contributed to the EWall Project, including at least Patrick Winston, William Porter, Edith Ackermann, Mike Kahan, Yao Li, Matt Sither, Benjamin Wang, Raudel Rodriguez, Akshay Patil, and the Named Inventors.

27. The singular includes the plural and vice versa.

28. As used herein, “any,” “all,” “every,” or “each” should be understood to include and encompass “any and all.”

29. As used herein, “day” or “date” shall mean the exact day, month, and year if ascertainable, or if not, the best available approximation (including relationship to other events).

30. The terms “identity” and “identify”:

(a) When used with respect to a natural person, shall mean to state the person’s full name and present or last known home and business Address, telephone number, employer or business affiliation, employment history, and educational background;

(b) When used with respect to a Document, shall mean to state the author or originator of the document, each person to whom the document was addressed and to whom a copy of the document was given or sent, the date appearing on the face of the document, the date of preparation of the document, the date and manner of distribution of the document, the general nature or a description of the document (i.e., whether it is a letter, memorandum, drawing, etc.) and the number of pages of which it consists, the subject of the document, a brief description of the contents of the document, the identity of the person who can authenticate the document, the source of the document, and the present or last-known custodian of the document;

(c) When used with respect to a patent or patent application, shall mean to state:

(i) its country; (ii) its patent and application numbers; (iii) its dates of filing, publication, and grant;

(iv) the names of the individual patentees (as the term “patentees” is used under United States

practice) and corporate applicants or assignees; (v) its title; (vi) the identity of each corresponding U.S. and foreign patent application and patent; (vii) the docket number or other designation thereof used by or on behalf of Cogmedia; and

(d) When used with respect to a corporation, shall mean to state: (i) its name; (ii) its place of incorporation or organization; (iii) its principal place of business; and (iv) the identity of all persons affiliated with the corporation who have knowledge of the matter with respect to which it is named in response to a Request.

31. The terms “and” and “or” shall be construed conjunctively when such construction would bring within the Request Documents, Things, or information that would otherwise be outside of its scope, and shall be construed disjunctively when such construction would bring within the Request Documents, Things, or information that would otherwise be outside of its scope.

32. The use of a verb in any tense shall be construed as including the use of the verb in all other tenses.

INSTRUCTIONS

1. If Cogmedia’s response to a particular Request is a statement that Cogmedia lacks the ability to comply with that Request, Cogmedia must specify whether the inability to comply is because the particular Document or Thing never existed, has been destroyed, has been lost, misplaced, or stolen, or has never been, or is no longer, in Cogmedia’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 Document or Thing must be identified.

2. If, because of a claim of privilege, You do not respond to any Request or subpart thereof, or You withhold any Document or Thing, set forth the privilege claimed, the facts upon

which You rely to support the claim of privilege, and furnish a list identifying each document and thing for which the privilege is claimed, together with the following additional information:

(a) A brief description of the nature and subject matter of the Document, including the title and type of document (*i.e.*, whether it is a letter, memorandum, drawing, etc.) or Thing;

(b) The Document's date or the Thing's date of creation;

(c) The identity of the author(s) or creator(s);

(d) The identity of the Person(s) to whom the document is addressed or to whom the thing has been provided, including all Persons who received copies, photographs, or other representations of the Document or Thing;

(e) The identity of the Person(s) to whom the Document or Thing was sent;

(f) The identity of the present custodian of the Document or Thing;

(g) The current location of the Document or Thing;

(h) For each Document, its number of pages; and

(i) The Request or subpart to which the Document, information, or other Thing is otherwise responsive.

3. The singular and masculine form of a noun or pronoun shall embrace, and shall be read and applied as, the plural or the feminine or neuter, as the particular context makes appropriate.

4. With respect to each of the following Requests, unless otherwise stated in a particular Request, the Documents or Things requested are that which are current to the date of Cogmedia's response thereto.

5. If You object to complying with any Request, state the basis of Your objection(s),

identify the type or categories of Documents or Things, and respond with respect to all Documents or Things for which an objection does not apply.

6. Cogmedia's obligation to comply with these Requests is continuing and its productions are to be supplemented to include subsequently acquired Documents or Things in accordance with the requirements of the Federal Rules of Civil Procedure.

REQUESTS

REQUEST FOR PRODUCTION NO. 1:

Documents sufficient to show any pecuniary interest that any Entity or Person has in this Action.

REQUEST FOR PRODUCTION NO. 2:

All Documents and Things referring or relating to the Asserted Patents.

REQUEST FOR PRODUCTION NO. 3:

All Documents and Things relating to any plan or decision to file this Action against Meta.

REQUEST FOR PRODUCTION NO. 4:

All Documents and Things referring to, discussing, referencing, or relating to Meta or Meta's Accused Products, including but not limited to any Documents exchanged with or made available to or by any Third Party.

REQUEST FOR PRODUCTION NO. 5:

All Documents and Things relating to any Third Party's past or present right, title, or interest in the Patents-in-Suit and the outcome of this Action.

REQUEST FOR PRODUCTION NO. 6:

All Documents and Things relating to Cogmedia's claim of damages, including Documents and Things supporting or refuting Cogmedia's contention that this is an exceptional case within

the meaning of 35 U.S.C. § 285, and Documents and Things concerning any lost profits or reasonable royalty to which Cogmedia contends it is entitled and the basis for its computation, including Documents and Things pertaining to the costs, gross revenues, and net profits or royalty rate Cogmedia relies on for computation, and any of the fifteen factors given for determining a reasonable royalty in *Georgia-Pacific Corp. v. U.S. Plywood Corp.*, 318 F. Supp. 1116, 1120 (S.D.N.Y. 1970), *modified and aff'd*, 446 F.2d 295 (2d Cir. 1971).

REQUEST FOR PRODUCTION NO. 7:

All Documents and Things relating to any valuation of the Asserted Patents or Related Patents, including the valuation of any portfolio or collection of patents in which one or more of the Asserted Patents or Related Patents has been offered for sale, license, assignment, or transfer.

REQUEST FOR PRODUCTION NO. 8:

All Agreements referring or relating to the Asserted Patents or Related Patents.

REQUEST FOR PRODUCTION NO. 9:

All Documents and Things referring or relating to Cogmedia's claim of ownership or rights to the Asserted Patents, including Documents referring or relating to any assignment, license, offer to license, sale, offer for sale, or transfer of any right or interest (legal or financial) in the Asserted Patents or Related Patents whether to or from Cogmedia.

REQUEST FOR PRODUCTION NO. 10:

All Documents and Things referring or relating to the licensing of the Asserted Patents or Related Patents, including but not limited to each Agreement and draft Agreement in which any right, title, or interest in the Asserted Patents or Related Patents was licensed, Communications or Documents reflecting any proposed or actual royalty rate or payment for licensing the Asserted Patents or Related Patents, cease-and-desist letters involving the Asserted Patents or Related

Patents and Communications or Documents relating thereto, and Communications or Documents reflecting discussions, negotiations, inquiries, or proposals relating to the licensing of the Asserted Patents or Related Patents, including but not limited to any valuations relating thereto.

REQUEST FOR PRODUCTION NO. 11:

All Documents and Things relating to any non-infringing alternative to any product believed to infringe or accused of infringing any asserted claim of the Asserted Patents, whether or not You contend such items to be non-infringing alternatives by Cogmedia.

REQUEST FOR PRODUCTION NO. 12:

All Documents and Things referring or relating to Cogmedia's costs, revenues, income, profits, or losses, including all financial and income statements on a quarterly and annual basis for each year since Cogmedia was founded, annual reports, and shareholder reports.

REQUEST FOR PRODUCTION NO. 13:

All Documents and Things relating to Cogmedia's contention that the Accused Products infringe the asserted claims of the Asserted Patents, either literally or under the doctrine of equivalents, and either directly or indirectly.

REQUEST FOR PRODUCTION NO. 14:

All Documents and Things relating to Your analysis, consideration, or evaluation of whether any product, device, apparatus, method, process, or system infringes any claim of any of the Patents-in-Suit or Related Patents, including, without limitation, all Documents relating to any test, evaluation, or reverse engineering of any product, device, apparatus, method, process, or system.

REQUEST FOR PRODUCTION NO. 15:

All Documents and Things relating to any product, device, apparatus, method, process, or system that You contend embodies or practices any asserted claim of the Patents-in-Suit, either alone or in combination, including any such product, device, apparatus, method, process, or system marketed by You or any Licensee to the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 16:

All Documents and Things referring or relating to activities undertaken to commercialize the claimed subject matter of the Patents-in-Suit, whether successful or not, including all contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or joint development agreements exchanged with any Third Party, sufficient to show each discussion with or disclosure to a Third Party.

REQUEST FOR PRODUCTION NO. 17:

All Documents and Things referring or relating to any activities undertaken to enforce the Patents-in-Suit against any Person, including without limitation any plan, proposal, or strategy for enforcing the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 18:

All Documents and Things relating to any opinions about the patentability, enforceability, scope, or infringement of the Patents-in-Suit, including but not limited to statements by any Named Inventor, or opinions of counsel.

REQUEST FOR PRODUCTION NO. 19:

All Documents and Things relating to the prosecution of the Patents-in-Suit, including without limitation the preparation and filing of any applications that led to the issuance of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 20:

All Documents relating to any plan or decision to cite or not to cite prior art to the U.S. Patent and Trademark Office during the prosecution of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 21:

All Documents and Things referring or relating to all Prior Art that pertains to the claimed subject matter of the Patents-in-Suit, whether or not cited to the U.S. Patent and Trademark Office, including all Prior Art known to You, the Named Inventors of the Patents-in-Suit, and the prosecuting attorneys prior to and during the pendency of the Asserted Patents, and any Prior Art known as of the present.

REQUEST FOR PRODUCTION NO. 22:

All Documents and Things relating to the identification, selection, or determination of the proper Named Inventors for the Patents-in-Suit, including any Communications discussing who should or should not be named as an inventor on the Patents-in-Suit or any Related Application, any analyses of inventive contribution or inventorship, and any Documents reflecting the basis for the decision to name Paul Keel and Jeffrey Huang as the sole inventors and to exclude other EWall Project Contributors.

REQUEST FOR PRODUCTION NO. 23:

All Documents and Things relating to Communications between You and any Named Inventor relating to the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 24:

All Documents and Things relating to any problem allegedly solved by any invention disclosed or claimed in the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 25:

All Documents and Things relating to the conception, diligence, reduction-to-practice, design, and/or development of the Patents-in-Suit, including without limitation any experimentation or testing of the claimed subject matter of the Patents-in-Suit before the issuance of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 26:

All Documents and Things referring or relating to the contributions of each Person involved in the conception and/or reduction to practice of each invention claimed in the Patents-in-Suit, including, but not limited to, all Documents reflecting or describing the specific contributions of each such Person.

REQUEST FOR PRODUCTION NO. 27:

For each Person who is alleged to have invented any invention claimed in the Asserted Patents, any Related Patents, Related Application(s), or foreign counterparts: all publications authored by such Person regarding the subject matter of the Asserted Patents, including articles, books, and presentations; all patents, patent file histories, and patent applications on which such Person is a named inventor; and Documents and Things sufficient to show the background, education, and work history of such Person, including a resume or curriculum vitae.

REQUEST FOR PRODUCTION NO. 28:

All invention disclosure statements, lab notebooks, source code, schematics, flow charts, artwork, executables, software prototypes (including all archived versions), and other Documents and Things making any reference to, or referring in any way to, the conception, design, development activities, reduction-to-practice, or commercialization of the subject matter of each asserted claim of the Asserted Patents, including Documents and Things that were created on or

before the date of application for the Asserted Patents or the priority date claimed, whichever is earlier, evidencing the conception, reduction-to-practice, design, and development of each claimed invention, and all drawings or written descriptions of the claimed subject matter of the Asserted Patents.

REQUEST FOR PRODUCTION NO. 29:

If You contend that any claim of any Asserted Patent is entitled to a priority date prior to the filing date of that patent, all Documents and Things relating to any factual and legal bases for that contention.

REQUEST FOR PRODUCTION NO. 30:

All Documents and Things referring or relating to the level of skill in the art relevant to any asserted claim of the Asserted Patents.

REQUEST FOR PRODUCTION NO. 31:

All Documents and Things referring or relating to any secondary considerations or objective indicia of non-obviousness that You contend shows the non-obviousness of any asserted claim of the Asserted Patents, including but not limited to Documents and Things sufficient to show any nexus between any claimed secondary considerations or objective indicia of non-obviousness to any claimed inventions, long-felt need for the subject matter of the claim, failure of others to solve a problem solved by the subject matter of the claim, unexpected results, or commercial success.

REQUEST FOR PRODUCTION NO. 32:

All Documents and Things relating to the first public disclosure, first sale, first offer for sale, or first use of any invention disclosed or claimed in the Patents-in-Suit, including the first such description in a printed publication.

REQUEST FOR PRODUCTION NO. 33:

All Documents and Things relating to any invention disclosed or claimed in the Patents-in-Suit that was made, sold, offered for sale, publicly used, or disclosed prior to the publication dates of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 34:

All Documents and Things relating to the marketing, use, sale, or offer for sale of any product, device, apparatus, method, process, or system that You contend practices or embodies any asserted claim of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 35:

All Documents and Things relating to any allegation, whether formal or informal, that any claim of the Patents-in-Suit is invalid or unenforceable, including without limitation any invalidity contentions from the Related Actions.

REQUEST FOR PRODUCTION NO. 36:

All Documents and Things reviewed, referenced, consulted, or relied upon in forming the basis for the allegations or beliefs set forth in any pleading in this Action, including without limitation all Documents and Things relating to Your allegations of notice to Meta, all claim charts, all infringement analyses, and/or all other technical analyses prepared in connection with any such allegation.

REQUEST FOR PRODUCTION NO. 37:

All Documents and Things, including but not limited to pleadings, deposition transcripts, discovery responses, motions, or contentions, relating to any legal proceeding (including foreign proceedings) involving the Patents-in-Suit, including any Related Action.

REQUEST FOR PRODUCTION NO. 38:

All Documents and Things produced by You in any Related Action.

REQUEST FOR PRODUCTION NO. 39:

All Documents and Things referring or relating to any allegation that any Person has infringed the Patents-in-Suit or Related Patents, including all communications between You and any such Person, and all Documents and Things relating to the negotiation of any license agreements, such as draft agreements, claim charts, or infringement, invalidity, unenforceability, or any other contentions exchanged between You and any such Person.

REQUEST FOR PRODUCTION NO. 40:

Documents and Things sufficient to identify the names, positions, titles, duties, and reporting relationships of personnel who have or have had responsibility for or duties relating to the use, research, design, development, testing, manufacture, operation, distribution, importation, sale, licensing, and marketing of any product that You allege embodies an invention claimed in any of the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 41:

All Documents and Things relating to any efforts to mark any products You contend embody the Patents-in-Suit.

REQUEST FOR PRODUCTION NO. 42:

All Documents and Things relating to the overall design, architecture, and functionality of the EWall Project (also known as “EWall,” “Electronic Card Wall,” or “EWall: Computational

Support for Decision Making in Collaborative Environments”), including each of its modules (Workspace, Information, Knowledge, Collaboration, and Visualization) and how they interacted, and including all project plans, white papers, research proposals, and overviews of the EWall system.

REQUEST FOR PRODUCTION NO. 43:

All source code, object code, executables, compiled binaries, screen captures, video recordings, all software prototypes including archived versions, implementations, and versions of the EWall system, including the “three software prototypes” described in the May 1, 2017 Declaration of Paul Erich Keel, Ph.D. (submitted in connection with Application No. 15/243,497).

REQUEST FOR PRODUCTION NO. 44:

All design documents, specifications, requirements documents, architecture diagrams, technical documentation, installation guides, user manuals, readme files, and other Documents describing the design, configuration, or use of any EWall prototype, module, or implementation.

REQUEST FOR PRODUCTION NO. 45:

All Documents and Things relating to the “Information Object” format used in the EWall system, including its visual representation, data structure, component elements (such as any picture, heading, hyperlink, or interactive features), and functionality, and all Documents reflecting or describing the relationship between EWall’s Information Objects and the “information objects” and “cards” recited in the Asserted Patents.

REQUEST FOR PRODUCTION NO. 46:

All Documents and Things relating to the NewsView and NewsStripe components of the EWall Project, including all prototypes, source code, design documents, screenshots, and

demonstrations thereof, and all Documents reflecting the dates on which prototypes thereof were completed and made available.

REQUEST FOR PRODUCTION NO. 47:

All Communications concerning the development, testing, deployment, or demonstration of the EWall system or any module, component, or prototype thereof, including Communications among Named Inventors, every EWall Contributor, and any other Person involved in the EWall Project.

REQUEST FOR PRODUCTION NO. 48:

All Documents and Things reflecting or describing the relationship between the EWall Project and the inventions claimed in the Asserted Patents, including any Documents in which any Person states, analyzes, or discusses both the EWall Project and the Asserted Patents.

REQUEST FOR PRODUCTION NO. 49:

All Documents reflecting or describing the contributions of each EWall Contributor to the EWall Project and/or to any invention claimed in the Asserted Patents, including but not limited to any Documents reflecting whether any such Person contributed to the conception of any claimed invention.

REQUEST FOR PRODUCTION NO. 50:

All employment agreements, consulting agreements, assignment agreements, invention assignment provisions, technology transfer policies, or other Agreements relating to the ownership of intellectual property to which any Named Inventor or any EWall Contributor was a party in connection with work relating to the EWall Project or the subject matter of the Asserted Patents.

REQUEST FOR PRODUCTION NO. 51:

All Documents and Things relating to any grant, contract, or funding agreement between the Office of Naval Research or any other government agency and any Person or entity relating to the EWall Project, including Grant and/or Contract Nos. N00014-02-1-0132, N00014-04-1-0569, and N00014-08-C-0206, including all proposals, applications, progress reports, interim reports, final reports, deliverables, and Communications with the ONR or any government agency, and all provisions relating to intellectual property rights, government purpose license rights, march-in rights, invention reporting obligations, or other rights reserved by or granted to the United States Government.

REQUEST FOR PRODUCTION NO. 52:

All Documents and Things relating to any demonstration, presentation, workshop, conference, or other event at which the EWall Project or any prototype, module, or feature thereof was presented, demonstrated, or discussed, including but not limited to ONR Collaborative Knowledge Management (CKM) Workshops or any demonstrations at MIT, including all attendee lists, agendas, presentation slides, handout materials, sign-in sheets, photographs, video recordings, and related Communications, and including all post-event reports, summaries, or memoranda.

REQUEST FOR PRODUCTION NO. 53:

All Documents and Things relating to the website ewall.mit.edu or any other website, web page, or web portal (including password protected) describing or involving the EWall Project, including all versions of any such website captured by archive.org or otherwise, and all Documents relating to the content, creation, modification, dates of publication, and availability of any such website or web page.

REQUEST FOR PRODUCTION NO. 54:

All Documents and Things relating to or referenced in the May 1, 2017 Declaration of Paul Erich Keel, Ph.D. submitted in connection with Application No. 15/243,497, the September 12, 2008 Declaration of Paul Erich Keel submitted in connection with Application No. 11/118,301, and any other declaration or sworn statement of any Named Inventor submitted to the U.S. Patent and Trademark Office in connection with the prosecution of the Asserted Patents or any Related Application, including all Documents and Things referenced, discussed, or relied upon in any such declaration.

REQUEST FOR PRODUCTION NO. 55:

All Documents and Things relating to any rights of the United States Government in the Asserted Patents or any Related Patents, including any government purpose license rights, march-in rights, or other rights arising under the Bayh-Dole Act (35 U.S.C. §§ 200–212) or otherwise from federal funding of the EWall Project, including all invention disclosures, confirmatory licenses, or other filings made to any government agency concerning inventions arising from the EWall Project, and all Communications with any government agency concerning such rights.

REQUEST FOR PRODUCTION NO. 56:

Documents and Things sufficient to show Your document retention policies.

REQUEST FOR PRODUCTION NO. 57:

All Documents and Things relating to any modification, destruction, or loss of any Documents or Things requested herein.

REQUEST FOR PRODUCTION NO. 58:

All Documents and Things identified, reviewed, referenced, consulted or relied upon in responding to any discovery request, including all Interrogatories, Requests for Production, and Requests for Admission, propounded in this Action or any Related Action.

REQUEST FOR PRODUCTION NO. 59:

All Documents and Things that Plaintiff will seek to offer into evidence at trial.

Dated: April 28, 2026

Respectfully submitted,

By:

/s/ Matthias A. Kamber

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Attorneys for Defendant Meta Platforms, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 28, 2026, the foregoing was served on all counsel of record by e-mail.

By: /s/ Matthias A. Kamber
Matthias A. Kamber

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

COGMEDIA LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Civil Action No. 1:25-cv-12127

**DEFENDANT META PLATFORMS INC.'S
FIRST SET OF INTERROGATORIES (NOS. 1-15)
TO PLAINTIFF COGMEDIA LLC**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules for the District of Massachusetts, Defendant Meta Platforms, Inc., (“Defendant” or “Meta”) requests that Plaintiff Cogmedia LLC (“Plaintiff” or “Cogmedia”) respond to the following Interrogatories in writing, under oath, and in accordance with the following Definitions and Instructions, within thirty (30) days from the date of service thereof. Plaintiff shall supplement all responses to these Interrogatories as required by the Federal Rules of Civil Procedure.

DEFINITIONS

1. “You,” “Your,” “Plaintiff,” or “Cogmedia” means (i) Plaintiff Cogmedia LLC, (ii) its present or former directors, principals, owners, members, officers, employees, agents, representatives, accountants, investigators, consultants, attorneys, and predecessors or successors in interest, and any parent, subsidiary, joint venture, affiliated entities or other legal entities that are wholly or partially owned or controlled, either directly or indirectly, that were in existence during the applicable period of time covered by these Interrogatories; (iii) any other Person acting on their behalf or on whose

behalf they acted; and (iv) any other Person otherwise subject to their control, or which controls them, or with which they are under common control.

2. “Defendant” or “Meta” means Meta Platforms, Inc.

3. “Party” or “Parties” refer to the Defendant and the Plaintiff.

4. “Action” means the case captioned as *Cogmedia LLC v. Meta Platforms, Inc.*, No. 1:25-cv-12127 in the District of Massachusetts, and any appeals thereof.

5. “Complaint” means the Complaint for Patent Infringement filed by Cogmedia LLC in this Action on July 30, 2025, as well as any supplements thereof or amendments thereto.

6. “’371 Patent” means U.S. Patent No. 11,036,371—including any reexamination certificate and certificate of correction.

7. “’562 Patent” means U.S. Patent No. 9,817,562—including any reexamination certificate and certificate of correction.

8. “’141 Patent” means U.S. Patent No. 10,664,141—including any reexamination certificate and certificate of correction.

9. “Asserted Patents” or “Patents-in-Suit” mean the ’371 Patent, the ’562 Patent, and the ’141 Patent.

10. “Related Application” means any parent or ancestral application related in any way to the Asserted Patents and any continuing application, continuation-in-part application, divisional application, file-wrapper continuation, reexamination proceeding, reissue application, abandoned application, or foreign counterpart application for that patent.

11. “Related Patent” means any patent that issued from any Related Application, including any patent that may have been opposed, re-examined, re-issued, or subjected to any validity or nullity proceeding.

12. “Prior Art” has the same meaning as it has in the applicable version of 35 U.S.C. §§ 102 and/or 103. This meaning includes any patent, printed publication, physical product or component, prior knowledge, prior use, prior sale or offer for sale, or other act or event defined in 35 U.S.C. §§ 102 and/or 103, taken alone or in combination.

13. “Named Inventor” shall mean any person listed as an inventor on the face of any of the Asserted Patents.

14. “Third Party” means any person or entity other than Cogmedia and Meta.

15. “Document” is used in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure, and includes but is not limited to all of the following matter in Your actual or constructive possession, custody, or control: all written, handwritten, typewritten, drawn, graphic, printed, recorded, magnetic, optical, electronic, or otherwise produced or reproduced matter or medium of any kind on which any intelligence or information is recorded or stored, or from which any intelligence or information can be obtained, translated, if necessary, by Cogmedia through detection devices into reasonably usable form. “Document” includes but is not limited to the original and any non-identical copy, whether different from the original because of any notes, marks, alterations, writings, or other changes made on said copy or otherwise. By way of example, and not by way of limitation, “Document” includes any advertising literature; agreement; archive record; bank record or statement; blueprint; book; book of account; booklet; brochure; calendar; chart; check; circular; coding form; communication (including without limitations intra- or inter-company communication); compilation; computer printout; computer-readable form; computer software and firmware, including supporting indices, data, documentation, flow charts, comments, object code, source code, and computer programs relating thereto; contract; copy; correspondence (including without limitation cablegrams, radiograms,

telegrams, and telefaxes); data (in any form); database; diary; direction; display; draft of any document; drawing; e-mail or electronic mail; file (whether current or expired); film; flyer; forecast; form; graph; handbook; history; index; information that has been stored, recorded, or transmitted electronically (including but not limited to voicemail, video mail, and electronic mail, and information stored or recorded on, or transmitted by, cellular telephones, smartphones, or other communication devices, personal digital assistants or other handheld computers, home or business computers, desktop computers, laptop computers, mainframe computers, notebook computers, personal computers, networked or stand-alone computers, or Internet websites); instruction; instruction book, booklet, manual, or sheet; invoice; job requisition; ledger; legal pleadings or filings of any kind; letter; license; machinery manual; magazine; magnetic media of any kind (including but not limited to disks, floppy disks, tapes, back-up tapes, or other media containing computer software, firmware, or data of any kind); manual; map; memorandum; minutes or other records of meetings, conferences, or telephone or intercom conversations, including lists of persons attending the meetings, conferences or conversations; newsletter; newspaper or other clipping; note; notebook (including but not limited to laboratory, engineering, or other notebooks); operator manual; opinion; optical disc or other optical medium of any kind containing computer software, firmware, or data of any kind; pamphlet; paper; patent, patent application, periodical or other publication; phonorecord; photograph (whether digital or analog); portfolio; PowerPoint presentation or any portion thereof; press release; price list; print; printed circuit board; project history; promotional literature; proposal; quotation; receipt; record; recorded Read-Only Memory (ROM); recording; report; sales literature; schematic; server log; sketch; slide; solicitation; spreadsheet; statement; statistical compilation; stenographic notes; study; summary (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); telephone log; test results; text; transparency; travel or expense report or record; video mail; video recording; video tape; voice mail; voice recording; voucher; work paper or worksheet; written contract, license, or sales agreement; written offer for purchase or sale; and any other written or documentary material of any nature.

16. “Communication” and “Communications” shall mean any transmission of information by any means, including without limitation telephone conversations, letters, telegrams, teletypes, telexes, telecopies, facsimiles, computer linkups, wireless transmissions, written memoranda, electronic devices, voicemail, e-mail, and face-to-face conversations.

17. “Thing” or “Things” is used in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure, and includes, but is not limited to, objects of every kind and nature other than a Document. By way of example, and not by way of limitation, “thing” or “things” includes prototypes, models, specimens, and the like, and commercially manufactured items.

18. “Agreement” shall mean any contract, undertaking, promise, covenant, arrangement, or understanding, or other agreement of whatever kind or nature whatsoever, whether written or oral, including all supplements and additions, changes, amendments, and modifications therefor, and all cancellations, revocations, rescissions, and terminations thereof.

19. “Person” shall mean: (a) natural persons (also referred to as “individuals”); (b) business or legal entities, including, without limitation, corporations, partnerships, joint ventures, firms, associations, professional corporations, and proprietorships; and (c) governmental bodies or agencies.

20. “Address” shall mean the city, state, and country of the residence or place of

business. If the person or business has more than one Address, provide each.

21. “Discuss,” “concern” or “concerning,” “refer to,” and “relate to” or “relating to” shall mean, directly or indirectly, and in whole or in part, pertaining to, mentioning, commenting on, connected with, describing, analyzing, explaining, showing, reflecting, identifying, setting forth, dealing with, embodying, comprising, consisting of, containing, constituting, resulting from, recording, or in any way relevant to, a particular subject.

22. “Licensee” or “Assignee” means any entity with which Plaintiff has a license, assignment, covenant not to sue, or other understanding, written, oral or implied, that the entity has any rights to one or more of the Asserted Patents or Related Patents, may practice one or more claims of one or more of the Asserted Patents or Related Patents and/or that Plaintiffs will not file suit or otherwise enforce against that entity one or more claims of one or more of the Asserted Patents or Related Patents.

23. “Accused Products” refers to the products Cogmedia identifies in its Preliminary Infringement Contentions dated February 4, 2026.

24. “Related Actions” means any proceedings involving the Patents-in-Suit and/or Related Patents, including but not limited to *Inter Partes* Review Nos. IPR2026-00247; IPR2026-00248; and IPR2026-00249.

25. “EWall Project” or “EWall System” refers to the EWall (Electronic Card Wall) project and related technology developed at the Massachusetts Institute of Technology and/or under sponsorship of the Office of Naval Research, including all projects, systems, disclosures, software prototypes, modules, publications, presentations, and demonstrations thereof.

26. “EWall Contributors” are the Persons that contributed to the EWall Project, including at least Patrick Winston, William Porter, Edith Ackermann, Mike Kahan, Yao Li, Matt Sither, Benjamin Wang, Raudel Rodriguez Akshay Patil, and the Named Inventors.

27. The singular includes the plural and vice versa.

28. As used herein, “any,” “all,” “every,” or “each” should be understood to include and encompass “any and all.”

29. As used herein, “day” or “date” shall mean the exact day, month, and year if ascertainable, or if not, the best available approximation (including relationship to other events).

30. The terms “identity” and “identify”:

(a) When used with respect to a natural person, shall mean to state the person’s full name and present or last known home and business Address, telephone number, employer or business affiliation, employment history, and educational background;

(b) When used with respect to a Document, shall mean to state the author or originator of the document, each person to whom the document was addressed and to whom a copy of the document was given or sent, the date appearing on the face of the document, the date of preparation of the document, the date and manner of distribution of the document, the general nature or a description of the document (i.e., whether it is a letter, memorandum, drawing, etc.) and the number of pages of which it consists, the subject of the document, a brief description of the contents of the document, the identity of the person who can authenticate the document, the source of the document, and the present or last-known custodian of the document;

(c) When used with respect to a patent or patent application, shall mean to state:

(i) its country; (ii) its patent and application numbers; (iii) its dates of filing, publication, and grant;

(iv) the names of the individual patentees (as the term “patentees” is used under United States

practice) and corporate applicants or assignees; (v) its title; (vi) the identity of each corresponding U.S. and foreign patent application and patent; (vii) the docket number or other designation thereof used by or on behalf of Cogmedia; and

(d) When used with respect to a corporation, shall mean to state: (i) its name; (ii) its place of incorporation or organization; (iii) its principal place of business; and (iv) the identity of all persons affiliated with the corporation who have knowledge of the matter with respect to which it is named in response to an Interrogatory.

31. The terms “and” and “or” shall be construed conjunctively when such construction would bring within the Interrogatory Documents, Things, or information that would otherwise be outside of its scope, and shall be construed disjunctively when such construction would bring within the Interrogatory Documents, Things, or information that would otherwise be outside of its scope.

32. The use of a verb in any tense shall be construed as including the use of the verb in all other tenses.

INSTRUCTIONS

1. If Cogmedia’s response to a particular Interrogatory is a statement that Cogmedia lacks the ability to comply with that Interrogatory, Cogmedia must specify whether the inability to comply is because the particular Document or Thing never existed, has been destroyed, has been lost, misplaced, or stolen, or has never been, or is no longer, in Cogmedia’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 Document or Thing must be identified.

2. If, because of a claim of privilege, You do not respond to any Interrogatory or subpart thereof, or You withhold any Document or Thing, set forth the privilege claimed, the facts

upon which You rely to support the claim of privilege, and furnish a list identifying each document and thing for which the privilege is claimed, together with the following additional information:

(a) A brief description of the nature and subject matter of the Document, including the title and type of document (*i.e.*, whether it is a letter, memorandum, drawing, etc.) or Thing;

(b) The Document's date or the Thing's date of creation;

(c) The identity of the author(s) or creator(s);

(d) The identity of the Person(s) to whom the document is addressed or to whom the thing has been provided, including all Persons who received copies, photographs, or other representations of the Document or Thing;

(e) The identity of the Person(s) to whom the Document or Thing was sent;

(f) The identity of the present custodian of the Document or Thing;

(g) The current location of the Document or Thing;

(h) For each Document, its number of pages; and

(i) The Interrogatory or subpart to which the Document, information, or other Thing is otherwise responsive.

3. The singular and masculine form of a noun or pronoun shall embrace, and shall be read and applied as, the plural or the feminine or neuter, as the particular context makes appropriate.

4. With respect to each of the following Interrogatories, unless otherwise stated in a particular Interrogatory, the information sought is that which is current to the date of Cogmedia's response thereto.

5. If You object to complying with any Interrogatory, state the basis of Your

objection(s), identify the type or categories of information, and respond with respect to all information for which an objection does not apply.

6. Cogmedia's obligation to comply with these Interrogatories is continuing and its responses are to be supplemented to include subsequently acquired Documents or Things in accordance with the requirements of the Federal Rules of Civil Procedure.

INTERROGATORIES

INTERROGATORY NO. 1:

If You contend that you are entitled to any remedy or monetary recovery as a result of alleged infringement of the Asserted Patents by Meta, state whether You contend that Plaintiff is entitled to lost profits or a reasonable royalty, and provide all facts and bases upon which You rely in support of Your contention such as the relevant damages period. Specifically, if You contend Plaintiff is entitled to an award of lost profits damages, identify each of Plaintiff's products You allege fall within the scope of any Asserted Patent(s), and state the costs, gross revenues, and net profits derived therefrom in each fiscal or calendar year since such sales commenced. If You contend Plaintiff is entitled to an award of reasonable royalty damages, state what You assert to be a reasonable royalty to be paid by Meta under 35 U.S.C. § 284, including the complete factual bases on which You base your calculation of such royalty rate, including the date of the hypothetical negotiation, the identity of the hypothetical willing licensor and licensee, and all facts and assumptions underlying Your royalty calculation, including the applicable royalty base.

INTERROGATORY NO. 2:

Describe in detail the ownership history of the Patents-in-Suit and all rights thereto, including without limitation, identifying the current owner of the Patents-in-Suit, any assignments and licenses of the Patents-in-Suit, and any attempted or completed transfers of title or other rights of the Patents-

in-Suit, and for each assignment, license or agreement, specifically: (a) state the date the assignment, license or agreement was made; (b) identify all persons involved in the assignment, license or agreement and describe the involvement of each such person; (c) state the purpose of the assignment, license or agreement; and (d) identify all documents (by Bates number) that relate to the assignment, license or agreement, or negotiation of the same.

INTERROGATORY NO. 3:

Identify all Persons that have any current or past financial interest in the Patents-in-Suit or Related Patents, or any portfolio or collection of patents that include any of the foregoing, or that have any financial interest in the outcome of this Action or any Related Action, or that have invested in, provided funding to, or otherwise provided financial support to Cogmedia (whether characterized as an investment, loan, litigation funding, or payment for services), and for each such Person:

- (a) describe the nature of such Person's financial interest, investment, or funding arrangement;
- (b) describe all payments, investments, or other monetary or non-monetary consideration paid or received by each such Person, including the amounts, dates, and terms thereof;
- (c) identify all Agreements between Cogmedia and each such Person relating to the Asserted Patents, this Action, or any Related Action, including any agreement governing the distribution of any recovery from this Action;
- (d) describe any decision-making authority such Person has with respect to the prosecution of this Action or any Related Action; and
- (e) identify all Documents, knowledgeable Persons, and any other evidence relating thereto.

INTERROGATORY NO. 4:

Identify and describe any and all reverse engineering, inspection, testing, evaluation, teardown, or analysis of any of Meta's products, including:

- (a) the products reverse engineered, inspected, tested, evaluated, torn down, or analyzed;
- (b) how the products identified in (a) were obtained;
- (c) the nature of the reverse engineering, inspection, testing, evaluation, or analysis performed;
- (d) any and all persons and entities involved in the reverse engineering, inspection, testing, evaluation, teardown or analysis;
- (e) the date(s) of any such reverse engineering, inspection, testing, evaluation, teardown, or analysis;
- (f) the results of such reverse engineering, inspection, testing, evaluation, teardown, or analysis;
- (g) for each product identified in (a), any and all source code, APIs, or technical features examined; and
- (h) any Documents and Things relating thereto.

INTERROGATORY NO. 5:

Identify and describe in detail each product or system made or sold by Plaintiff or any Licensees of the Patents-in-Suit that Plaintiff contends or believes embodies or practices any claim of the Patents-in-Suit, and for each and every such product:

- (a) identify whether such product was ever sold, offered for sale, licensed, or made available for use by any Person, the dates thereof, and all revenues derived therefrom; and
- (b) provide a claim chart for each such product separately identifying where each limitation of each claim may be found within each product, and all Documents, knowledgeable persons, and any other evidence relating thereto.

INTERROGATORY NO. 6:

Identify and describe in detail all efforts undertaken to mark any product with the Patents-in-Suit, including an identification of the beginning and end dates of any such patent marking (including the beginning and end dates of any interruption in patent marking), the seller of such marked products, and the manner of marking for each marked product (such as the location of the patent mark and/or the manner of such patent marking), and an identification of whether any licensee was required or requested to mark (such as under 35 U.S.C. § 287), and Plaintiff's efforts to ensure compliance with marking obligations.

INTERROGATORY NO. 7:

If You contend that any claim of any Asserted Patent is entitled to a priority date prior to the filing date of that patent, state all factual and legal bases for that contention, including identifying which claims and patents You contend are entitled to which priority dates and which documents support Your contentions.

INTERROGATORY NO. 8:

State whether You, a Named Inventor, or EWall Contributor have ever demonstrated, used or disclosed publicly, sold, or offered for sale any product, system, or device (including any prototype) before the filing dates of the Patents-in-Suit to any Third Party or the public, and for each such demonstration, use, disclosure, sale, or offer for sale, identify:

- (a) the date of such demonstration, use, disclosure, sale, or offer for sale,
- (b) the parties involved including names of all individuals and companies involved,
- (c) the location of such demonstration, use, disclosure, sale, or offer for sale,
- (d) the identity of the product, system, or device,
- (e) a description of the technical details of that the product, system, or device, and

(f) any non-disclosure agreement or similar agreement that You contend govern the confidentiality of any such demonstration, use, disclosure, sale, or offer for sale, associated with the product system, or device.

INTERROGATORY NO. 9:

State whether You contend any secondary considerations or objective indicia of non-obviousness supports non-obviousness of any asserted claim of the Patents-in-Suit, including without limitation any nexus between any claimed secondary considerations or objective indicia of non-obviousness to any claimed invention, long-felt need for the subject matter of the claim, failure of others to solve a problem solved by the subject matter of the claim, unexpected results, or commercial success, and if so, explain fully the basis for such assertion, including identifying any Documents that relate to such contention and identifying any witness with knowledge of such contention.

INTERROGATORY NO. 10:

Identify and describe in detail all activities undertaken by Plaintiff to commercialize the subject matter of the Patents-in-Suit whether successful or not, including an identification of all persons with whom Plaintiff discussed any investments, licenses, research, and/or development relating to the Patents-in-Suit, and all contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or joint development agreements exchanged with any third party, and the persons most knowledgeable regarding the activities identified herein.

INTERROGATORY NO. 11:

For each Patent-in-Suit, describe in detail all marketing, advertising, and promotion relating to its attempted licensing or commercialization, whether in print, on television, on the Internet, or otherwise, including an identification of all vendors, consultants, and/or agencies that worked on the

marketing, advertising, and/or promotions; describe the quantity of the dissemination of the marketing material(s), advertisements, or promotional material(s); identify each individual or entity that participated in the marketing, advertising, and promotion of the product; describe the role of each individual or entity in the marketing, advertising, and/or promotion of the Asserted Patent; and identify the person(s) responsible for the marketing, advertising, and/or promotion of each patent.

INTERROGATORY NO. 12:

For each Named Inventor of the Patents-in-Suit:

(a) identify the Named Inventor and provide their present or last known address, telephone number, employer, job title, and job description;

(b) describe in detail the employment and consulting history of each Named Inventor from 2000 to the present, including for each position: the employer or client, the dates of employment or engagement, and the job title and responsibilities;

(c) identify all employment agreements, consulting agreements, technology transfer policies, invention assignment agreements, or other Agreements relating to the ownership of intellectual property to which each Named Inventor was or is a party;

(d) for Named Inventors not currently employed by Plaintiff, state whether such individual or their current employers is contractually obligated to provide information or assistance to You in connection with this Action, and describe the circumstances by which such individual's employment with You or a Licensee was terminated, if they were previously so employed;

(e) identify all funding sources, grants, contracts, or sponsorship agreements that supported work by any Named Inventor leading to the inventions claimed in the Asserted Patents, including but not limited to any grants or contracts from the Office of Naval Research; and

(f) identify all Documents relating to the foregoing.

INTERROGATORY NO. 13:

Describe in detail the EWall Project, including:

(a) the overall design, architecture, and functionality of the “EWall” or “Electronic Card Wall” system, including a description of each of its modules (e.g., Workspace, Information, Knowledge, Collaboration, and Visualization) and how they interacted;

(b) the relationship between the EWall Project and the inventions claimed in the Asserted Patents, including whether You contend that the EWall Project practices and/or discloses any claim or the Asserted Patents, and if so, the complete factual basis for that contention (including the date of any such practice or disclosure), and if not, the complete basis for any distinction between the EWall Project and the claimed inventions;

(c) all software prototypes, implementations, and versions of the EWall system, including the “three software prototypes” described in the May 1, 2017 Declaration of Paul Erich Keel, Ph.D. (submitted in connection with Application No. 15/243,497), and for each prototype or implementation: (i) its date of creation and completion; (ii) a description of its functionality and which EWall modules it implemented; (iii) the hardware and software environment(s) on which it was developed and ran; (iv) all Persons who designed, developed, coded, or contributed to its creation; (v) all Persons to whom it was demonstrated, made available, or distributed, and the dates thereof; (vi) whether any non-disclosure or confidentiality agreement governed access; and (vii) its current location, custodian, and whether source code, executables, or archived versions still exist;

(d) the “Information Object” used and described in the EWall system, including its format, visual representation, data structure, and functionality (such as any picture, heading, hyperlink, comment, vote, copy, or other interactive features associated with the Information Objects), and the

relationship between EWall's Information Objects and the "information objects" and "cards" recited in the Asserted Patents;

(e) the NewsView and NewsStripe components of the EWall Project, including the dates on which any prototypes or implementations thereof were completed and made available, their functionality, and all Persons involved in their development;

(f) all Persons who contributed to the conception, design, development, or implementation of the EWall Project, including but not limited to each EWall Contributor, and a description of each Person's specific contributions;

(g) the dates on which any aspect of the EWall system was first (i) conceived, (ii) reduced to practice (actually or constructively), (iii) publicly demonstrated or disclosed, (iv) made available to any Person outside a confidential relationship, and (v) described in any publication, presentation, or report; and

(h) all Documents and Things relating to the foregoing.

INTERROGATORY NO. 14:

Identify and describe all grants, contracts, sponsorship agreements, and other funding arrangements between the Office of Naval Research ("ONR") or any other government agency and any Person or entity relating to the EWall Project, including Grant and/or Contract Nos. N00014-02-1-0132, N00014-04-1-0569, and N00014-08-C-0206, and:

(a) for each grant, contract, or funding arrangement, identify: (i) the parties; (ii) the dates and amounts of funding; (iii) the deliverables, milestones, or objectives; (iv) all intellectual property provisions, including any government purpose license rights, march-in rights, invention reporting obligations, or other rights reserved by or granted to the United States Government; and (v) all reporting obligations and all reports, deliverables, or publications submitted pursuant thereto;

(b) identify each public demonstration, presentation, workshop, conference, or other event at which the EWall Project or any aspect thereof was presented, demonstrated, or discussed in connection with any ONR-funded program, including but not limited to ONR Collaborative Knowledge Management (CKM) Workshops, and for each such event, identify: (i) the date and location; (ii) the attendees; (iii) what was presented, demonstrated, or discussed, including whether any software prototype was demonstrated; (iv) whether any non-disclosure or confidentiality agreements applied to any attendee or the event; and (v) all Documents relating thereto, including agendas, attendee lists, sign-in sheets, presentation slides, handout materials, and post-event reports or summaries;

(c) identify any other public demonstration, presentation, or disclosure of the EWall Project not covered by sub-part (b), including any demonstrations at MIT or elsewhere, and provide the same information requested in sub-part (b)(i) through (b)(v); and

(d) identify all Documents and Things relating to the foregoing.

INTERROGATORY NO. 15:

For each asserted claim of the Patents-in-Suit, describe in detail all facts and circumstances relating to the conception, reduction to practice, and development of the claimed invention, including:

(a) the earliest date You contend that the subject matter of each asserted claim was conceived, and all facts, witnesses, and Documents supporting that contention;

(b) the earliest date You contend that the subject matter of each asserted claim was actually reduced to practice, a description of the acts constituting such reduction to practice (including identification of any prototype, software implementation, or working system that embodied the claimed invention), and all facts, witnesses, and Documents supporting that contention;

(c) if You contend that the subject matter of any asserted claim was constructively reduced to practice by the filing of a patent application, identify the application and its filing date;

(d) all activities constituting diligence between conception and reduction to practice;

(e) for each Named Inventor, identify the specific contribution that Person made to the conception of each asserted claim, including which claim limitations were conceived by which Named Inventor, and describe the circumstances of such conception (including the date, location, and any corroborating witnesses or Documents);

(f) state whether any EWall Contributor other than the Named Inventors contributed to the conception of the subject matter of any asserted claim, and if You contend that none of the EWall Contributors contributed to the conception of any claimed invention, state the complete factual basis for that contention as to each such person;

(g) describe the relationship, if any, between the conception and reduction to practice of the claimed inventions and the EWall Project, including whether any aspect of the EWall Project constituted or contributed to the conception or reduction to practice of any claimed invention, and if You contend that the claimed inventions are distinct from the EWall Project, state the complete factual basis for that contention; and

(h) identify all Documents relating to the foregoing, including invention disclosure statements, laboratory notebooks, design documents, correspondence, and any other contemporaneous evidence of conception or reduction to practice.

Dated: April 28, 2026

Respectfully submitted,

By:

/s/ Matthias A. Kamber

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 28, 2026, the foregoing was served on all counsel of record by e-mail.

By: /s/ Matthias A. Kamber
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