

addresses and telephone number, and present or last known business addresses and telephone number.

- b. a business entity, means to state the full name, headquarters address, and state of registration of the entity and the names and positions of the individual or individuals connected with such entity who have knowledge of the information requested.
- c. a document, means to identify the document by bates number, or if it is not bates numbered, to state the type of document (letter, memorandum, email, etc.), its dates, author(s) or originator(s), addressee(s), all individuals who received copies of the document, the identity of persons known or believed by you to have present possession, custody or control thereof, and a brief description of the subject matter and present location. The foregoing is unnecessary if the document is being produced to Samsung in lieu of the answer to an Interrogatory. If the document has already been produced, “identify” means to provide the production number of the document.
- d. a product, Software, service, system or method means to specify a part number, trade name, catalog number, version number, and any other designation used to refer to the product, Software, service, system or method.

4. The term “**Services**” shall be interpreted to include any commercial activity provided by an entity to another entity to aid in business, including but not limited to information technology services, maintenance services, and other services related to Defendants’ work.

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

6. **“You,” “Your,” and “Yours,” or “Defendants” and “Samsung”** mean Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in the above-styled civil action; their parents, subsidiaries, and affiliates; and their officers, directors, employees, representatives, agents, and all persons acting on their behalf, and any unnamed defendants.

7. **“Plaintiff” and “TopWire”** mean Plaintiff TopWire, LLC in the above-styled civil action; its parents, subsidiaries, and affiliates; and their officers, directors, employees, representatives, agents, and all persons acting on their behalf.

8. The terms **“and”** and **“or”** shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

9. **“Including”** means “including but not limited to.”

10. The terms **“all,” “any,” and “each”** shall each be construed as encompassing any and all.

11. **“Person” and “Entity”** mean any natural person and any cognizable entity, including, without limitation, corporations, proprietorships, partnerships, joint ventures, joint marketing entities, businesses, limited liability companies, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies, orders, groups acting in concert, or any person acting in a representative capacity.

12. **“Asserted Patent”** refers to U.S. Patent No. 9,859,202.

13. **“Accused Instrumentalities”** means the packaging structures that TopWire alleges infringe the Asserted Patent, including those identified in TopWire’s operative Complaint (Dkt. 1), TopWire’s P. R. 3-1 Infringement Contentions and those TopWire later identifies during discovery. By way of example, TopWire alleges that the dual substrate, stacked logic boards inside Samsung’s smartphones, including the metal pads/pillars (*e.g.*, copper/tin pillars/pads) and core substrates separating the packaging substrates (*e.g.*, substrate-like printed circuit boards) and the chips (*e.g.*, RF chips, memory chips, CPU chips, WiFi chips, audio codec chips, modem chips, transceiver chips, power management chips, amplifier chips, envelop tracking chips, NFC chips, and digital signal processing chips) disposed on the top of each packaging substrate, infringe the Asserted Patent.

14. **“Accused Products”** means any hardware systems, devices, or apparatuses comprising the Accused Instrumentalities that infringe the Asserted Patent, including those hardware systems, devices, or apparatuses identified in TopWire’s operative Complaint (Dkt. 1) and TopWire’s P. R. 3-1 Infringement Contentions and those hardware systems, devices, or apparatuses further identified during discovery, including Samsung’s response to Interrogatory No. 1.

INSTRUCTIONS

1. For each of the Interrogatories contained herein, the information sought is that which is current to the date of your response. All the Interrogatories contained herein are of a continuing nature and supplemental responses are required in accordance with Federal Rule of Civil Procedure 26(e).

2. If you do not answer any Interrogatory in full, state the precise reason for failing to do so. If a legal objection is made, set forth the specific nature of the grounds for that objection. If

only a portion of any Interrogatory cannot or will not be answered, (i) provide a full answer to the remaining portion, and (ii) specifically set forth (a) the fact that the answer is incomplete and (b) the reasons or grounds for any omission or for your inability or refusal to complete the answer. If an Interrogatory can be answered only in part on the basis of information available at the time of the response, (i) provide an answer on the basis of that information, (ii) indicate that your answer is so limited, and (iii) provide a further response, in accordance with paragraph 1 of these Instructions, when further information becomes available. If any information is withheld on the basis of a claim of privilege or work product, then the answer shall: (i) generally identify the information withheld by subject matter, author, addressees, and carbon copy recipient(s); (ii) state the basis for withholding the information; and (iii) identify the person(s) knowledgeable about the subject matter of the withheld information.

3. If any document referred to in your response to these Interrogatories was, but is no longer in your possession, custody, or control, state what disposition was made with each document and when such disposition was made. If any document referred to in response to these Interrogatories has been lost or destroyed, describe in detail the circumstances of such loss or destruction and Identify each lost or destroyed document, including all files that contained such document.

4. All Interrogatories must be answered fully and in writing in accordance with Federal Rules of Civil Procedure 11 and 33.

5. Each Interrogatory should be answered separately and fully in writing under oath. The person who makes the answers must sign them, and the attorney who objects must sign any objections.

6. Each Interrogatory shall be set forth immediately prior to the response thereto.

7. If you object to any interrogatory based on an assertion of privilege, you should expressly make the claim and serve at the time you serve your responses to these interrogatories a privilege log as set forth in Federal Rule of Civil Procedure 26(b)(5).

8. If the procedure for answering Interrogatories as authorized by Federal Rule of Civil Procedure 33(d) is used, for each Interrogatory and subpart thereof, specify the production (*i.e.*, Bates) numbers of the specific document or group of documents.

9. If You or Your lawyers find any of these interrogatories vague, confusing, hard to understand, or if You just want to talk through any issues relating to these requests, please call Sean Keller at (214) 800-4510. Please do not wait and object instead of attempting to resolve the issue with a telephone call. Thank you.

INTERROGATORIES

INTERROGATORY NO. 1

Identify all hardware systems, devices, or apparatuses that comprise the Accused Instrumentalities. This identification shall include all version(s) of any Accused Instrumentalities (including any internal model number(s) and/or commercial/marketing name(s)).

RESPONSE:

INTERROGATORY NO. 2

For each of the hardware systems, devices, or apparatuses identified in Your response to Interrogatory No. 1, state by year, quarter, and month the units, revenues, expenses, and profits associated with Your sale or other commercialization of all version(s) of the hardware systems, devices, or apparatuses that comprise the Accused Instrumentalities.

RESPONSE:

INTERROGATORY NO. 3

Describe the development and implementation of the Accused Instrumentalities, including identification of any third parties You worked with to develop and implement the Accused Instrumentalities and/or third-party suppliers You rely upon to supply the Accused Instrumentalities and/or components of the Accused Instrumentalities.

RESPONSE:

INTERROGATORY NO. 4

State in detail how and when you first became aware of the Asserted Patent.

RESPONSE:

INTERROGATORY NO. 5

Identify and describe all agreement(s) that you contend would constitute a comparable license to a license between Plaintiff and You to the Asserted Patent. Your description should include an identification of the parties to any such agreement(s), a description of the financial terms and considerations associated with any such agreement(s), and a summary of the technology at issue subject to any such agreement(s).

RESPONSE:

INTERROGATORY NO. 6

For each agreement you contend is a comparable license to the Asserted Patent in response to Interrogatory No. 5, state all factual base(s) upon which you base your contention that the agreement is technologically and/or economically comparable to a license between Plaintiff and You to the Asserted Patent.

RESPONSE:

INTERROGATORY NO. 7

Identify the date that you contend is the date for the hypothetical negotiation under *Georgia-Pacific Corp. v. U.S. Plywood Corp.* and describe why you contend that is the proper date.

RESPONSE:

INTERROGATORY NO. 8

To the extent you contend that acceptable non-infringing alternatives or design arounds exist to any of the Asserted Patent, identify all such non-infringing alternatives or design-arounds,

and state in full all factual bases supporting the existence, availability, acceptability, and feasibility of implementation as to each such acceptable non-infringing alternative or design-around.

RESPONSE:

INTERROGATORY NO. 9

For each alleged non-infringing alternative or design around identified in response to Interrogatory No. 8, identify and describe any and all steps that you have taken or plan to take to implement that alleged non-infringing alternative or design around. Your answer should include an identification of all persons involved in development and implementation of the alleged alternative or design around, the costs of any such implementations, and whether the substitute or design around is still contained in the product. For any planned implementation of an alleged non-infringing alternative or design around, your answer should include the intended dates of any such implementations and the expected costs of any such implementations.

RESPONSE:

INTERROGATORY NO. 10

If You contend that any of the Accused Products or Accused Instrumentalities do not infringe any asserted claim of the Asserted Patent, please identify the specific reasons why, including but not limited to the element or elements of each claim that You assert the Accused Products or Accused Instrumentalities do not practice, and describe with particularity the basis for Your contention, including the specific evidence that You assert proves that a particular claim limitation is not satisfied by those Accused Products or Accused Instrumentalities.

RESPONSE:

INTERROGATORY NO. 11

Describe the factual and legal basis for Samsung's Ninth Affirmative Defense provided in Defendant's Answer and Defenses In Response to Plaintiff's Complaint (Dkt. 18).

RESPONSE:

INTERROGATORY NO. 12

Describe the factual and legal basis for Samsung's Twelfth Affirmative Defense provided in Defendant's Answer and Defenses In Response to Plaintiff's Complaint (Dkt. 18).

RESPONSE:

INTERROGATORY NO. 13

Describe the factual and legal basis for Your defense that TopWire's claims for relief are limited or barred, in whole or in part, by 35 U.S.C. §§ 286, 287, and/or 288, and TopWire's right to seek damages and costs is limited and/or barred, in whole or in part, by 28 U.S.C. § 1498.

RESPONSE:

INTERROGATORY NO. 14

To the extent You contend there are differences as between the Accused Instrumentalities in different Samsung products that are relevant to infringement, identify and describe all such differences and the Samsung products into which those identified differences are incorporated.

RESPONSE:

Dated: May 18, 2026

Respectfully submitted,

/s/ Warren J. McCarty, III

Warren J. McCarty, III

State Bar No.: 24107857

Sean Keller

State Bar No.: 24124532

Zachary Grinovich

State Bar No.: 24149804

AHMAD, ZAVITSANOS & MENSING, PLLC

2001 Ross Avenue, Suite 520

Dallas, Texas 75201

(214) 800-4501

wmccarty@azalaw.com

skeller@azalaw.com

zgrinovich@azalaw.com

Jason McManis

State Bar No.: 24088032

AHMAD, ZAVITSANOS & MENSING, PLLC

1221 McKinney Street, Suite 2500

Houston, Texas 77010

(713) 655-1101

jmcmanis@azalaw.com

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the May 18, 2026, a copy of the foregoing was served on the following party electronically to all counsel of record via email.

/s/ Warren J. McCarty, III
Warren J. McCarty, III