

# Exhibit C

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*Attorneys for Plaintiff*  
*Philips North America LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

Philips North America LLC,

*Plaintiff,*

v.

Garmin International, Inc.  
and Garmin Ltd.,

*Defendants.*

Case No. 2:19-cv-06301-AB-KS

**PHILIPS NORTH AMERICA, LLC'S  
OBJECTIONS AND RESPONSES TO  
DEFENDANT GARMIN  
INTERNATIONAL, INC'S FOURTH  
SET OF DISCOVERY REQUESTS**

1 **PHILIPS NORTH AMERICA, LLC'S**  
2 **OBJECTIONS AND RESPONSES TO DEFENDANT GARMIN**  
3 **INTERNATIONAL, INC'S FOURTH SET OF DISCOVERY REQUESTS**

4 Pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, Plaintiff  
5 Philips North America LLC ("Philips"), by and through its attorneys, hereby objects and  
6 responds to Defendant Garmin International, Inc.'s ("Garmin") Fourth Set of Discovery  
7 Requests as follows:

8 **GENERAL OBJECTIONS**

9 1. Philips objects to each and every definition, interrogatory, request, and  
10 instruction to the extent Garmin seeks to impose requirements or any burdens  
11 inconsistent with or in addition to Philips's obligations under the applicable rules,  
12 including the Federal Rules of Civil Procedure, the Local Rules, any order of this Court,  
13 or any stipulation or agreement between the parties.

14  
15 2. Philips objects to each and every interrogatory, request, definition, and  
16 instruction to the extent it is overly broad, unduly burdensome, oppressive, and/or  
17 irrelevant to the subject matter of this action. Philips further objects to each and every  
18 interrogatory, request, definition, and instruction to the extent it is not proportional to the  
19 needs of the case, considering the importance of the issues at stake in the action, the  
20 amount in controversy, the party's relative resources, the importance of the discovery in  
21 resolving the issues, and whether the burden or expense of the proposed discovery  
22 outweighs its likely benefit.

23  
24 3. Philips objects to each and every interrogatory, request, definition, and  
25 instruction to the extent Garmin seeks information that is protected by the attorney-client  
26  
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28

1 privilege, the work product immunity doctrine, and/or any other applicable privilege,  
2 prohibition, limitation, or immunity from disclosure. Inadvertent production of such  
3 information shall not constitute the waiver of any applicable privilege, doctrine,  
4 immunity, or objection, including, but not limited to, objections on the basis of  
5 competency, confidentiality, relevancy, materiality, work product, privilege, and/or  
6 admissibility as evidence.  
7  
8

9 4. Philips objects to each and every interrogatory, request, definition, and  
10 instruction to the extent Garmin calls for information or the production of documents or  
11 things not in Philips's possession, custody, or control, and/or not obtainable by means of  
12 a reasonably diligent search, including, without limitation, documents or things that are  
13 not maintained by Philips in the normal course of business or that are no longer  
14 maintained by Philips.  
15  
16

17 5. Philips objects to each and every interrogatory, request, definition, and  
18 instruction to the extent Garmin seeks information that is already in its possession or  
19 available from a public source as to which the burden of Garmin's obtaining such  
20 information is the same as or less than it would be for Philips.  
21

22 6. Philips objects to each and every interrogatory, request, definition, and  
23 instruction to the extent Garmin seeks information that is a trade secret and/or  
24 confidential or proprietary business information of Philips or any third party. To the  
25 extent that Philips agrees to provide documents or material containing confidential  
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1 information, it will only do so subject to the Protective Order proposed and/or entered in  
2 this case.

3  
4 7. Philips objects to each request that may seek documents or information  
5 related to foreign proceedings on the basis that any foreign proceedings are not relevant  
6 to this action, and any production of materials in response to this request should not be  
7 treated as an admission as to the relevance or admissibility of any documents, materials,  
8 or submissions made in a foreign proceeding.

9  
10 8. Philips objects to each and every request, definition, and instruction to the  
11 extent it is vague, ambiguous, or confusing by failing to adequately define terms or  
12 failing to describe the information with reasonable particularity. Subject to the General  
13 and Specific Objections, Philips will produce reasonably available, relevant, responsive,  
14 non-privileged information only to the extent that Philips understands each request and to  
15 the extent such information is available after a reasonable search.

16  
17  
18 9. Philips objects to each and every request, definition, and instruction to the  
19 extent Garmin seeks the disclosure of third party confidential information that Philips is  
20 under a legal duty not to disclose.

21  
22 10. Philips objects to each and every request, definition, and instruction to the  
23 extent they are inconsistent with the Local Rules, any applicable Standing Orders, any  
24 Scheduling Order in this case, any Docket Control Order in this case, any order on the  
25 discovery of Electronically Stored Information, and/or any Joint Discovery / Case  
26 Management Plan in this case.  
27  
28

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