Exhibit 6

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16   **UNITED STATES DISTRICT COURT**

17   **NORTHERN DISTRICT OF CALIFORNIA**

18   **SAN JOSE DIVISION**

19
    LYFT, INC.,   Case No. 5:21-cv-04653-BLF
20
                        Plaintiffs,   **DEFENDANT AGIS SOFTWARE**
21   **DEVELOPMENT LLC'S OBJECTIONS**
                                         AND RESPONSES TO LYFT INC.'S
22   v.   **JURISDICTIONAL 30(b)(6) NOTICE TO**
                                         DEFENDANT AGIS SOFTWARE
23 AGIS SOFTWARE DEVELOPMENT LLC,   **DEVELOPMENT LLC**

24   Defendant.
                                         Hon. Judge Beth Labson Freeman
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RUSS AUGUST & KABAT

1   Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant AGIS Software

2   Development LLC ("Defendant" or "AGIS Software") hereby responds and objects to Plaintiff Lyft,

3   Inc.'s ("Lyft" or "Plaintiff") Jurisdictional Rule 30(b)(6) Notice of Deposition served in the above-

4   captioned case on February 4, 2022 (the "Notice"). AGIS Software reserves the right to further

5   supplement or amend these objections and responses to the extent allowed by the Federal Rules of

6   Civil Procedure, the Local Rules of this Court, and any applicable scheduling orders.

7   **GENERAL OBJECTIONS AND QUALIFICATIONS**

8   The following general objections and statements apply to each of Plaintiff's deposition

9   topics and are hereby incorporated within each specific response set forth below. No specific

10 objections are intended to constitute, or should be construed as constituting, a waiver of any general

11 objection.

12   1.   The Court's Order (Dkt. 61) permitted Lyft to conduct "jurisdictional discovery in

13 the form of five interrogatories and one four-hour Rule 30(b)(6) deposition." AGIS Software will

14 produce a witness for deposition for one four-hour Rule 30(b)(6) deposition in accordance with the

15 Court's Order.

16   2.   Any statement by AGIS Software that it will designate a witness to testify to the

17 topics contained in the Notice does not constitute an admission or representation that AGIS Software

18 has any knowledge or information related to a given Topic.

19
20   3.   AGIS Software objects to the time and date specified in the Notice. Subject to the

21 objections herein, AGIS Software will provide a designated witness or witnesses at a time and

22 location that is convenient to the witness or witnesses and that is mutually agreed upon by the parties.

23 AGIS Software is willing to discuss and agree to a mutually convenient location, date, and time for

24 the noticed deposition.

25   4.   AGIS Software objects to the Notice and to each and every Topic, Definition, and

26 Instruction to the extent they seek to impose obligations different from or beyond those imposed by

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the Federal Rules of Civil Procedure, the Local Civil and Patent Rules of the Northern District of California, and the Orders governing this Action.

5.   AGIS Software objects to the Notice as seeking information that is not relevant to any party's claims or defenses, the subject matter involved in this Action, not reasonably calculated to lead to the discovery of admissible evidence, or not proportional to the needs of the case, considering the importance of the issues at stake in the Action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.

6.   AGIS Software objects to the Notice as seeking information that is protected from discovery by the attorney-client privilege, the work-product immunity doctrine, common interest doctrine, and/or any other applicable privilege, immunity, doctrine, or duty of confidentiality that precludes or limits the disclosure of information. Any inadvertent disclosure of such information shall not be deemed a waiver (in this way or any other proceeding) of the attorney-client privilege, work-product doctrine, or any other applicable privilege or protection.

7.   AGIS Software objects to the Notice to the extent it is vague, ambiguous, or unintelligible, and therefore fails to identify with reasonable particularity the information sought.

8.   AGIS Software objects to the Notice to the extent it seeks confidential, proprietary, or trade secret information of third parties. AGIS Software will only produce such material subject to the terms of the Protective Order and subject to any consent required by third parties.

9.   AGIS Software objects to the Notice as overly broad, and unduly burdensome to the extent that any Topic, Definition, or Instruction purports to require AGIS Software to provide information on "any," all," and "each and every" subjects, individuals, documents, actions, facts, or circumstances.

10.   AGIS Software objects to the Notice to the extent it calls for documents or information that are outside the scope of AGIS Software's knowledge, possession, custody, or control. AGIS further objects to the Topics, Definitions, and Instructions to the extent that Defendant can obtain the requested information from some other source that is more convenient, less burdensome, or less expensive.

11.   AGIS Software objects to the Notice to the extent that it seeks legal conclusions, information based on legal conclusions, or contentions through a Rule 30(b)(6) deposition.

12.   AGIS Software objects to the Notice as seeking multiple depositions of the same witness over the discovery period because the burden is not proportional to the needs of the case. AGIS Software's position is that any depositions of AGIS Software that implicate the same witness should be taken at the same time on consecutive days. AGIS Software objects to any attempt by Plaintiff to take multiple depositions of the same witness spread throughout the discovery period, without a legitimate reason, as contravening the discovery rules.

13.   AGIS Software objects to the Notice as cumulative, insofar as it seeks information already requested in Plaintiff's interrogatories, already provided to Plaintiff, already within Plaintiff's own possession, custody, or control, or that can be obtained from other means of discovery that would be more convenient or less burdensome.

14.   AGIS Software objects to the Notice as overly broad and unduly burdensome to the extent it fails to provide a reasonable time period for information sought, or otherwise seeks information beyond the relevant time frame for discovery in this Action.

15.   AGIS Software objects to the Notice to the extent it seeks to require AGIS Software to create or produce information that it does not maintain in the ordinary course of its business, or to the extent it seeks to require AGIS Software to create or produce information in a particular

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