

Exhibit 8

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21 **UNITED STATES DISTRICT COURT**
 22 **NORTHERN DISTRICT OF CALIFORNIA.**

23 **(San Jose Division)**

24 LYFT, INC.,

25 *Plaintiffs,*

26 v.

27 AGIS SOFTWARE DEVELOPMENT LLC,

28 Defendant.

Case No. 5:21-cv-04653-BLF

**DEFENDANT AGIS SOFTWARE
 DEVELOPMENT LLC'S OBJECTIONS
 AND RESPONSES TO LYFT INC.'S
 FIRST SET OF JURISDICTIONAL
 INTERROGATORIES (NOS. 1-5) TO
 DEFENDANT AGIS SOFTWARE
 DEVELOPMENT LLC, ADVANCED
 GROUND INFORMATION SERVICES,
 INC., AND AGIS HOLDINGS, INC.**

Hon. Judge Beth Labson Freeman

1 PLEASE TAKE NOTICE that, pursuant to Rules 26 and 33 of the Federal Rules of Civil
2 Procedure, the Local Rules of this Court, and the Court’s January 28, 2022 Order, Defendant AGIS
3 Software Development LLC (“AGIS Software” or “Defendant”) hereby responds to Plaintiff Lyft,
4 Inc.’s (“Lyft” or “Plaintiff”) First Set of Jurisdictional Interrogatories (Nos. 1-5) in writing, under
5 oath, and in accordance with the following definitions and instructions, within thirty (30) days of
6 the date of service thereof dated February 4, 2022. These Interrogatories are continuing in nature
7 and require supplementation in accordance with the Federal Rules of Civil Procedure, as follows:

8 These responses are made solely for the purposes of this action, and are made without
9 waiving, or intending to waive, the right at any time to revise, correct, modify, supplement, or clarify
10 any response provided herein or the right to object on any proper grounds to the use of these
11 responses, for any purpose in whole or in part, in any subsequent proceedings or any other action.
12 The right to raise any applicable objections at any time is expressly reserved. A response to any
13 interrogatory herein should not be taken as an admission or acceptance of the existence of any facts
14 set forth or assumed by such interrogatory, or that such response constitutes admissible evidence.
15 The responses herein reflect only the present state of AGIS Software’s investigation and the present
16 state of discovery. Except as otherwise indicated, an objection and/or response to a specific
17 interrogatory does not imply that facts responsive to the interrogatory exist.

18 GENERAL OBJECTIONS

19 1. AGIS Software objects to these Interrogatories as improperly directed to non-parties,
20 Advanced Ground Information Systems, Inc. and AGIS Holdings, Inc. Advanced Ground
21 Information Systems, Inc. and AGIS Holdings, Inc. are not parties to the present litigation. The
22 Court granted jurisdictional discovery in the form of five interrogatories to AGIS Software and one
23 four-hour Rule 30(b)(6) deposition of AGIS Software. Dkt. 61 at 10. AGIS Software responds on
24 behalf of AGIS Software only.

25 2. AGIS Software objects to these Definitions, Instructions, and Interrogatories as
26 overly broad, unduly burdensome, not proportional to the needs of this case, and seeking to impose
27 burdens beyond those required by the Federal Rules of Civil Procedure, the Local Civil and Patent
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1 Rules of the Northern District of California, and the Orders governing this action. AGIS Software
2 will respond to Plaintiff's Interrogatories consistent with the Federal Rules of Civil Procedure, the
3 Local Rules of this Court, and/or Orders of this Court.

4 3. AGIS Software objects to the Definition of "AGIS," "Defendant," "You," and
5 "Your" as overly burdensome, not proportional to the needs of the case and not relevant to any
6 party's claims or defenses because they include persons and entities outside of AGIS Software and
7 who are not under the control of AGIS Software. Accordingly, AGIS Software provides answers to
8 these Interrogatories on behalf of AGIS Software only. AGIS Software further objects to these
9 definitions to extent that they call for information from then-current or prior subsidiaries, parents,
10 affiliates, divisions, successors, predecessors, agents, employees, representatives, directors, officers,
11 trustees, and attorneys, that are not owned or controlled by AGIS Software or that are not in the
12 possession of AGIS Software. AGIS Software further objects to these definitions to the extent they
13 call for information protected from disclosure by the attorney-client privilege, the work product
14 doctrine, or any other applicable privilege or immunity insofar as the definition purports to include
15 attorneys.

16 4. AGIS Software objects to the Definition of "Third Party" and "Third Parties" as
17 overly broad, unduly burdensome, and seeking information not within AGIS Software's possession,
18 custody, or control.

19 5. AGIS Software objects to the Definition of "Person" as overly broad, unduly
20 burdensome, and seeking information not within AGIS Software's possession, custody, or control.

21 6. AGIS Software objects to the Definitions of "Communication," "Document,"
22 "Concerning," "concern(s)," "referring to," "relating to," "related to," "relate(s) to," "pertaining to,"
23 "pertain(s) to," and "identify" as (i) overly broad; (ii) unduly burdensome; (iii) not proportional to
24 the needs of this case; (iv) not relevant to any party's claims or defenses; (v) seeking information
25 that is not within AGIS Software's possession, custody, or control; and (vi) imposing burdens
26 beyond the requirements of the Federal Rules of Civil Procedure, the Local Civil and Patent Rules
27 of the Northern District of California, and the Orders governing this action.

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1 7. AGIS Software objects to these Definitions to extent they call for the production of
2 information protected from disclosure by the attorney-client privilege, the work product doctrine,
3 or any other applicable privilege or immunity insofar as the definition purports to include attorneys.

4 8. AGIS Software objects to Plaintiff's Interrogatories to the extent they seek
5 information not relevant to a claim or a defense of this litigation or proportional to the needs of the
6 case, considering the importance of the issues at stake in the action, the amount in controversy, the
7 parties' relative access to relevant information, the parties' resources, the importance of the
8 discovery in resolving the issues, and whether the burden or expense of the proposed discovery
9 outweighs its likely benefit. By responding to any Interrogatory or identifying or producing
10 documents or materials in response thereto, AGIS Software is not acknowledging or conceding the
11 relevance of any such material and reserves the right to object to the introduction of the evidence on
12 relevancy or any other grounds.

13 9. AGIS Software objects to Plaintiff's Interrogatories to the extent they seek material
14 protected by, or which may only be answered by, reliance upon any privileged or work product
15 information, including mental impressions, conclusions, opinions, or legal theories of AGIS
16 Software's counsel, experts, or consultants developed with or in anticipation of litigation. To the
17 extent reasonably possible, AGIS Software will attempt to interpret the Interrogatories as not
18 seeking privileged information. Inadvertent reference to privileged information by AGIS Software
19 shall not constitute a waiver of any applicable privilege.

20 10. AGIS Software objects to Plaintiff's Interrogatories as seeking information that is
21 less burdensomely and/or more appropriately obtained through other discovery means.

22 11. AGIS Software objects to Plaintiff's Interrogatories to the extent that they require
23 premature disclosure of expert testimony, evidence, argument, contentions, or any other disclosure
24 inconsistent with the Federal Rules of Civil Procedure, the Local Civil and Patent Rules of the
25 Northern District of California, or the Orders governing this action.

26 12. AGIS Software objects to the Interrogatories to the extent that they seek legal
27 conclusions. Where an Interrogatory includes words and concepts indicative of a legal conclusion,
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