

EXHIBIT G

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PHILIPS NORTH AMERICA LLC,)	
)	
Plaintiff,)	
)	C.A. No. 1:19-cv-11586-IT
v.)	
)	
FITBIT, INC.)	
)	
Defendant.)	
)	

**PLAINTIFF PHILIPS NORTH AMERICA LLC'S
FIRST SUPPLEMENTAL INITIAL DISCLOSURES**

Plaintiff Philips North America LLC (“Philips”), by and through counsel, provides the following first supplemental initial disclosures per Fed. R. Civ. P. 26(a)(1)(A) to Defendant Fitbit, Inc. (“Fitbit”).

These first supplemental initial disclosures are made without waiver of, and without prejudice to, any objections Philips may have regarding discoverability, admissibility, relevance, or applicability of any privilege or immunity regarding the subject matter of these disclosures or any documents or individuals identified herein.

These first supplemental initial disclosures are based on information available to Philips at this time. If and when Philips obtains additional, relevant information, it will further amend and/or supplement these disclosures to the extent required by Rule 26(e) of the Federal Rules of Civil Procedure, including by making

other disclosures in discovery, through witnesses, through documents, and/or any other means for production and/or supplementation of information.

A. Knowledgeable Persons

Based on the information presently available to Philips, Philips believes that the individuals identified below are likely to have knowledge relevant to Philips' claims and defenses. Philips reserves the right to supplement this list based on information learned during the course of discovery and continuing investigation, and incorporates any individuals identified during the course of discovery (whether via documents, testimony, or other disclosure) into this disclosure. Philips does not waive its right to object to the deposition of any of these individuals where proper:

Name	May Have Information Relevant to:	Contact Information
Gary Miller Root	Inventorship, the Asserted Patents	Through Philips' counsel
Frank van Hoorn	Inventorship, the Asserted Patents	Through Philips' counsel
Raymond J. Menard	Inventorship, the Asserted Patents	Through Philips' counsel
Roger J. Quy	Inventorship, the Asserted Patents	Through Philips' counsel
Corporate Representative(s) of Philips	Philips' Products and Business	Through Philips' counsel
Erik Pastink	Philips's Products and Business, Philips's Licensing Practices	Through Philips' counsel
Arie Tol	Philips's Products and Business, Philips's Licensing Practices	Through Philips' counsel
Peter Ridgeway	Certain Philips Products	Through Philips' counsel

Brian Sagi	Commercial interest in technology governed by the '377 Patent and Fitbit's knowledge of the '377 Patent	Through Philips' counsel
Jack Young	Fitbit's Knowledge of Asserted Patents, Willful Infringement	Third Party / Presently Unknown
Any witnesses noticed for deposition or actually deposed by Philips in this Action	See material covered at said deposition.	
Any witnesses noticed for deposition or actually deposed by Fitbit in this Action	See material covered at said deposition.	
Corporate Representative(s) of Fitbit.	Fitbit's Products and Business	Through Fitbit's counsel
Current Fitbit Employees	The design and operation of the Accused Products, as well as other aspects of Fitbit's products and business	Through Fitbit's counsel
Preethi Mukundun	Fitbit's business; marketing and surveys; topics for which she was designated.	Through Fitbit's counsel
Tom Hudson	Fitbit's business; marketing and surveys; topics for which she was designated.	Through Fitbit's counsel
Mark Silverio	Fitbit's business; marketing and surveys; topics for which she was designated.	Through Fitbit's counsel
Ryan Krems	Functionality of Accused Products; topics for which he was designated.	Through Fitbit's counsel
Gilles Boccon-Gibod	Functionality of Accused Products; topics for which he was designated.	Through Fitbit's counsel

Robert “Buddy” Herkenham	Functionality of Accused Products; topics for which he was designated.	Through Fitbit’s counsel
James Park	Any topics for which he was designated, Fitbit’s business, the Accused Products, knowledge of the Asserted Patents, Willful Infringement.	Through Fitbit’s counsel
Former Fitbit Employees and/or contractors	The design and operation of the Accused Products, as well as other aspects of Fitbit’s products and business	TBD
Victor Song	Notice of the Asserted Patents, Willful Infringement, Fitbit Patent Practices	1 Mandalay Place, Unit 1611, South San Francisco, CA 94080
Fitbit Customers	The operation of the Accused Products, as well as other aspects of Fitbit’s products and business	TBD

There are likely be additional individuals identified in documents produced by the parties and in response to interrogatories who have information related to the claims at issue and who may also be called as witnesses. Philips reserves the right to supplements these disclosures, and incorporates any individuals identified during discovery herein. Philips additionally identifies, and incorporates herein by reference, any additional individuals disclosed or identified by Fitbit and any supplementation thereto, and any witness otherwise deposed in this case. Philips reserves the right to present any witnesses for any topic relevant to this case, the recited areas of information are exemplary only and limited by the information available to Philips at this time.

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