

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

C. A. No. 13-2058-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

AT&T SERVICES, INC.,

Defendant.

C. A. No. 13-2061-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

C. A. No. 13-2062-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

COMCAST CABLE COMMUNICATIONS, LLC,

Defendant.

C. A. No. 13-2063-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

COX COMMUNICATIONS INC.,

Defendant.

C. A. No. 13-2064-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

DIRECTV LLC,

Defendant.

C. A. No. 13-2065-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

DISH NETWORK, LLC,

Defendant.

C. A. No. 13-2066-RGA

DRAGON INTELLECTUAL PROPERTY, LLC,

Plaintiff,

v.

SIRIUS XM RADIO INC.,

Defendant.

C. A. No. 13-2067-RGA

DRAGON INTELLECTUAL PROPERTY,
LLC,

Plaintiff,

v.

TIME WARNER CABLE INC.,

Defendant.

C. A. No. 13-2068-RGA

DRAGON INTELLECTUAL PROPERTY,
LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,

Defendant.

C. A. No. 13-2069-RGA

**DRAGON INTELLECTUAL PROPERTY, LLC'S
RESPONSE TO DEFENDANTS'
FIRST SET OF COMMON INTERROGATORIES [NOS. 1-11]**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiff Dragon Intellectual Property, LLC (“Dragon”) hereby responds to Defendants’ First Set of Common Interrogatories (Nos. 1-11). Discovery in this case has just begun, and Dragon’s investigation is ongoing. Dragon reserves the right to amend, modify, or supplement its answer, if necessary, in accordance with the Federal Rules of Civil Procedure.

GENERAL OBJECTIONS

1. Dragon objects to each interrogatory, definition, and instruction to the extent that it seeks to impose any obligations or burdens upon Dragon different from, in addition to, or exceeding the requirements of the Federal Rules of Civil Procedure.

2. Dragon objects to each interrogatory to the extent that it seeks information that is protected by the attorney-client privilege, the work-product doctrine, or any other common law or statutory privilege or protection, or that seeks information that is otherwise protected from discovery or disclosure.

3. Dragon objects to each interrogatory to the extent that it purports to require Dragon to account for information that is outside Dragon's possession, custody, or control on the grounds that such discovery is overly broad, unreasonably burdensome, and oppressive and will cause Dragon undue hardship.

4. Dragon objects to each interrogatory to the extent it seeks the disclosure of information that is and/or includes highly confidential information of Dragon or information protected by Dragon's privacy rights under federal and state law. Subject to the Court's Local Rules, Dragon will disclose such information subject to the Stipulated Protective Order.

5. Dragon objects to each interrogatory to the extent that it seeks information that is already in Defendants' possession or available from a public source as to which the burden of obtaining such information is the same for Defendants as it would be for Dragon.

6. Dragon objects to each interrogatory to the extent it seeks, individually or collectively, information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in contravention of Rule 26(b)(1) of the Federal Rules of Civil Procedure.

7. A number of the interrogatories to which Dragon responds below contain multiple subparts addressing discrete subject areas that are more properly addressed in separate interrogatories. Such interrogatories constitute separate interrogatories that count toward the

total limit of interrogatories that Dragons are permitted to propound under Scheduling Order and the Federal Rules of Civil Procedure.

8. Dragon objects to each interrogatory to the extent that it is cumulative or duplicative of other forms of discovery that are more convenient and less burdensome.

9. Dragon objects to Defendants' definition of "Plaintiff," "You," "Your," and "Dragon" because it is vague as to "affiliates," and "wholly owned or partially owned entities acting or purporting to act for or on behalf of the foregoing or who are subject to the direction or control of the foregoing..." Dragon also objects to the definition of "Plaintiff," "You," "Your" and "Dragon" to the extent it purports to seek information protected by the attorney-client privilege or the work-product doctrine.

10. Dragon objects to Defendants' definition of "Patent Family Tree" because it is overly broad in scope and leads to requests for irrelevant information.

11. Dragon objects to Defendants' definition of "Related Patents" because it is overly broad in scope and leads to requests for irrelevant information.

These general objections are referred to herein as "General Objections" and are incorporated by reference into each of Dragon's responses. The following responses are made subject to, and in reliance on, these general objections.

RESPONSE TO COMMON INTERROGATORIES

INTERROGATORY NO. 1:

With regard to each asserted claim of the Asserted Patent, describe in detail the conception, reduction to practice, and any diligence between the conception and reduction to practice, including without limitation the following:

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