

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NICHIA CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-681-RGA
)	
)	
TCL MULTIMEDIA TECHNOLOGY)	
HOLDINGS, LTD. and)	
TTE TECHNOLOGY, INC.,)	
)	
Defendants.)	
)	

DEFENDANTS' OBJECTIONS AND RESPONSES
TO NICHIA CORPORATION'S FIRST SET OF REQUESTS
FOR THE PRODUCTION OF DOCUMENTS AND THINGS

own files; and (vii) it seeks information about a time period that has no bearing on Plaintiff's claims.

Subject to and without waiving the foregoing general and specific objections, Defendants will produce relevant, non-privileged documents responsive to this request in Defendants' possession, custody, and control that are located after a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 50:

All Documents, including Communications with any third party, Concerning the preparation and/or filing of the petitions for *inter partes* review filed by VIZIO, Inc. with the U.S. Patent and Trademark Office, which petitions have been assigned Case Nos. IPR2017-00552, IPR2017-00551, IPR2017-00558, and IPR2017-00556.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Defendants incorporate by reference the General Objections above, as if fully set forth herein. Defendants further object to this request to the extent that: (i) it seeks information protected by the attorney-client privilege, the attorney work product doctrine, and/or other applicable privileges and protections, including the joint defense privilege and common interest doctrine; (ii) it seeks information that is neither relevant nor proportional to the needs of the case; (iii) it is vague, ambiguous, overly broad and unduly burdensome, especially due to incorporating the terms "Concerning"; (iv) it is overly broad and unduly burdensome, especially because it seeks "[a]ll" documents; (v) it seeks information unrelated to Plaintiff's infringement claims and, further, is duplicative of other requests; and (vi) it seeks information or documents that are either publicly available or are contained in Plaintiff's own files.

Subject to and without waiving the foregoing general and specific objections, Defendants will produce relevant, non-privileged documents responsive to this request in Defendants' possession, custody, and control that are located after a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 51:

Documents sufficient to identify the quantity of all Accused Products made, used, licensed, distributed, supplied, sold, or offered for sale in the United States, on a monthly, quarterly, and annual basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Defendants incorporate by reference the General Objections above, as if fully set forth herein. Defendants further object to this request to the extent that: (i) it seeks information protected by the attorney-client privilege, the attorney work product doctrine, and/or other applicable privileges and protections, including the joint defense privilege and common interest doctrine; (ii) it seeks information that is neither relevant nor proportional to the needs of the case; (iii) it is vague, ambiguous, overly broad and unduly burdensome; (iv) it is overly broad and unduly burdensome; (v) it seeks information unrelated to Plaintiff's infringement claims and, further, is duplicative of other requests; and (vi) it seeks information or documents that are either publicly available or are contained in Plaintiff's own files.

Subject to and without waiving the foregoing general and specific objections, Defendants will produce relevant, non-privileged documents responsive to this request in Defendants' possession, custody, and control that are located after a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 52:

All Documents that Defendants intend to rely upon to support its determination of damages for its infringement of the Asserted Patents.

Subject to and without waiving the foregoing general and specific objections, Defendants will produce relevant, non-privileged documents about the Asserted Patents that are responsive to this request in Defendants' possession, custody, and control that are located after a reasonably diligent search, as they pertain to *Nichia Corporation v. VIZIO, Inc.*, 8:16-cv-00545 (C.D. Cal.).

DATED: March 20, 2017

Respectfully submitted,

OF COUNSEL

Raymond N. Nimrod
James M. Glass
Gregory C. Wyckoff
QUINN EMANUEL URQUHART & SULLIVAN,
LLP
51 Madison Avenue, 22nd Floor
New York, NY 10001
Tel: (415) 875-6600
raynimrod@quinnemanuel.com
jimglass@quinnemanuel.com
gregorywyckoff@quinnemanuel.com

By /s/ Arthur G. Connolly

Arthur G. Connolly, III (No. 2667)
CONNOLLY GALLAGHER LLP
Brandywine Building
1000 North West Street, 14th Floor
Wilmington, DE 19801
Telephone: (302)757-7300
Fax: (302) 757-7299

*Attorneys for Defendants TCL Multimedia
Technology Holdings, Ltd. and TTE Technology,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2017, copies of the foregoing were caused to be served upon the following in the manner indicated:

Jack B. Blumenfeld, Esquire
Brian P. Egan, Esquire
MORRIS, NICHOLS, ARSHT & TUNNELL
LLP
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899

VIA ELECTRONIC MAIL

Attorneys for Plaintiff

Catherine Nyarady , Esquire
Daniel J. Klein, Esquire
David E. Cole, Esquire
Kenneth A. Gallo, Esquire
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019

VIA ELECTRONIC MAIL

Attorneys for Plaintiff

/s/ Arthur G. Connolly
Arthur G. Connolly, III (No. 2667)