

EXHIBIT 2502

January 15, 2019

VIA EMAIL

James M. Glass
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, NY 1001

Re: Cavium, LLC v. Alacritech, Inc.; Case IPR2018-00401: Objections to Requests for Production

Dear James:

I write in response to Patent Owner's Document Requests to Petitioner, IPR2018-00401, Ex. 2400 with respect to Petitioner, Cavium, LLC ("Cavium").

Cavium generally objects to each of PO's requests to the extent that they are vague, overly broad, unduly burdensome, or seek irrelevant or duplicative information. Cavium also objects to any request that seeks to impose requirements that are broader than the requirements set forth in the Office Patent Trial Practice Guide, the Federal Rules of Civil Procedure, and/or the Board's Decision on Motion for Additional Discovery, IPR2018-00401, Paper 24 (Nov. 20, 2018) ("Board Order") regarding discovery in this proceeding. Cavium further objects to each request to the extent that it seeks any information protected by the attorney-client privilege, work product privilege, common interest privilege, or any other applicable privilege and/or that seeks information that is proprietary business information that is otherwise irrelevant to the issues of privity or real-party-in-interest as it relates to this Petition. Cavium will not produce any communications between Cavium and its outside counsel. Cavium also objects to these requests to the extent that they seek discovery that is not relevant to any party's claims or defenses, proportional to the needs of the case, and/or reasonably calculated to lead to the discovery of admissible evidence. In addition, Cavium objects to the requested discovery to the extent that it exceeds the scope of permissible discovery in *inter partes* review proceedings.

With respect to Request No. 1, this Request seeks information that is not within Cavium's possession, custody or control—specifically, documents and communications relating to the indemnification and defense obligations, rights and interests between Intel and Dell, Intel and Wistron, and Intel and Century Link—and Cavium objects to the production of any such documents or communications. Cavium is not involved in any joint defense relationship or indemnification relationship with either Wistron or Century Link and, therefore, there are no documents to produce. Cavium also objects to this Request as vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence relevant to the issues of privity or real-party-in-interest. Cavium further objects to this request to the extent it seeks information protected by the attorney-client

privilege, work product privilege, common interest privilege, or any other applicable privilege. Subject to these objections, and the general objections set forth above, and to the extent that Cavium understands PO's request, Cavium will produce relevant, non-privileged documents relating to indemnification and defense obligations, rights and interests between Cavium and Dell relating to Alacritech's patents asserted in the District Court litigations, if they exist.

With respect to Request No. 2, this Request also seeks information that is not within Cavium's possession, custody or control—namely, documents and communications relating to any representations or warranties made by Intel to Dell, Wistron and/or Century Link about indemnity and defense obligations, rights and interests relating to Alacritech's patents—and Cavium objects to the production of such information. Cavium also objects to this Request as vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence relevant to the issues of privity or RPI. Subject to these objections, and the general objections set forth above, and to the extent that Cavium understands PO's request, Cavium will produce relevant documents and communications between Cavium and Dell regarding Cavium's indemnification and defense obligations to Dell relating to Alacritech's patents asserted in the District Court cases, to the extent they exist.

Regarding Request No. 3, Cavium objects to this Request as vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence relevant to the issues of privity or RPI. Cavium further objects to this Request to the extent that it seeks information protected by the attorney-client privilege (including communications with outside litigation counsel), work product privilege, common interest privilege, or any other applicable privilege. Cavium will not produce documents in response to this Request.

Finally, with respect to Request No. 4, Cavium also objects to this Request as vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence. Further, as you are aware, the PTAB limited this request to documents that relate to Alacritech's patents, to these proceedings, or to the indemnification or defense agreements relevant to the same, if they exist. Consistent with the PTAB's limitations, and subject to Cavium's objections, Cavium will produce non-privileged, relevant documents and communications memorializing the relationship between Cavium and Dell related to Alacritech's patents, these proceedings, or to the indemnification or defense agreements relevant to the same, if any exist.

Very truly yours,

RIMON P.C.



Karineh Khachatourian
Partner

KK:lmb