

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IRONBURG INVENTIONS LTD. a
United Kingdom Limited Company,

Plaintiff,

vs.

COLLECTIVE MINDS GAMING
CO. LTD.,

Defendant.

Civil Action No. 1:16-cv-04110-TWT

**DEFENDANT’S OBJECTIONS AND RESPONSES TO PLAINTIFF’S
SECOND SET OF REQUESTS FOR PRODUCTION**

Defendant Collective Minds Gaming Co. Ltd (“CMG”) hereby objects and responds to Plaintiff Ironburg Inventions Ltd.’s (“Ironburg”) Second Set of Requests for Production of Documents.

General Objections

1. CMG objects to Ironburg’s Requests and accompanying instructions to the extent they seek to impose obligations beyond those set forth in Rules 26 and 34 of the Federal Rules of Civil Procedure, any applicable local rules, and any obligations imposed by the Court’s scheduling and discovery orders. CMG will

RESPONSE TO REQUEST NO. 116.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege. CMG also objects to this Request as overbroad, irrelevant, and unduly burdensome to the extent it seeks documents irrelevant to the subject matter of this case.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 117:

Any Agreement between CMG and Valve that Refers or Relates to the Action, including but not limited to, any Joint Defense Agreement.

RESPONSE TO REQUEST NO. 117.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 118:

Any Agreement between CMG and Valve that Refers or Relates to Collective Minds Gaming Co. Ltd. v. Ironburg Inventions Ltd., IPR2018-00354, including but not limited to, any Joint Defense Agreement.

RESPONSE TO REQUEST NO. 118.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 119:

Any Agreement between CMG and Valve that Refers or Relates to Collective Minds Gaming Co. Ltd. v. Ironburg Inventions Ltd., IPR2018-00355, including but not limited to, any Joint Defense Agreement.

RESPONSE TO REQUEST NO. 119.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 120:

Any Agreement between CMG and Valve that Refers or Relates to Collective Minds Gaming Co. Ltd. v. Ironburg Inventions Ltd., IPR2018-00356, including but not limited to, any Joint Defense Agreement.

RESPONSE TO REQUEST NO. 120.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 121:

Any Agreement between CMG and Valve that Refers or Relates to Collective Minds Gaming Co. Ltd. v. Ironburg Inventions Ltd., IPR2018-00357, including but not limited to, any Joint Defense Agreement.

RESPONSE TO REQUEST NO. 121.

CMG objects to this Request to the extent it seeks documents covered by the attorney-client privilege, work product doctrine, or other applicable privilege.

In consideration of its general and specific objections, CMG is unaware of any documents responsive to this Request.

Dated: March 1, 2018

Respectfully Submitted,

/s/ Paul R. Hart

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