IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CYWEE GROUP LTD.,	)
	)
Plaintiff,	)
	) C.A. No. 18-571-RGA
v.	)
	)
GOOGLE LLC,	)
	)
Defendant.	)

GOOGLE'S OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION (NOS. 1-5)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Google LLC ("Google") responds and objects to Plaintiff CyWee Group Ltd.'s ("CyWee") First Requests For Production (Nos. 1-5) as follows:

GENERAL OBJECTIONS

Google objects generally to these requests, including the definitions and instructions applicable thereto, to the extent set forth below. The following General Objections and statements shall be applicable to, and shall be included in Google's specific objections to each document request by CyWee, whether or not mentioned expressly in any specific objections. Google does not waive any of its General Objections by also stating specific objections to any particular document request.

1. Google objects generally to the definitions provided in CyWee's requests. Google's responses to these requests do not constitute a representation that Google agrees or adopts any of CyWee's definitions.

2. Google objects to CyWee's definitions of "Google," "You," "Your," and "Defendant" as overbroad and unduly burdensome to the extent this definition purports to

include "all predecessors (merge, acquired, or otherwise), partners, investors, corporate parents, affiliated companies or corporations, divisions, departments, direct or indirect subsidiaries, officers, directors, employees, principals, agents, attorneys, servants, representatives, and all others over whom You have legal or actual control." Google is objecting and responding on its own behalf as Google LLC and not on behalf of any parents, subsidiaries, divisions, affiliates, predecessors, successors, and assigns, former officers, directors, owners, shareholders, employees, contractors, agents, attorneys, and representatives or any other person or entity acting in whole or in part in concert with any of the foregoing.

3.　　　Google objects to CyWee's definition of "Samsung" as overly broad and unduly burdensome to the extent this definition purports to include "Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc., individually and collectively, and/or all of their predecessors and successors (merged, acquired, or otherwise), partners, investors, corporate parents, affiliated companies or corporations, divisions, departments, direct or indirect subsidiaries, officers, directors, employees, principals, agents, attorneys, servants, representatives, and all others over whom Samsung has legal or actual control." Google is objecting and responding with respect to Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.

4.　　　Google objects to CyWee's definition of "related to" or "relating to" to the extent it seeks information unrelated to any party's claim or defense or that is not proportional to the needs of the case. Google further objects to the definitions of "related to" or "relating to" as vague, overbroad, and unduly burdensome as they purport to impose obligations on Google beyond those imposed by the Federal Rules of Civil Procedure or the applicable Local Rules of the United States District Court for the District of Delaware.

5.   Google objects to CyWee's requests to the extent that any instructions, definitions, or requests fail to comply with, or impose obligations on Google that are inconsistent with, are not found in, or exceed its obligations under the Federal Rules of Civil Procedure or the applicable Local Rules of the United States District Court for the District of Delaware.

6.   These responses and the objections and limitations contained herein are subject to and without waiver of (a) the right to make additional or supplemental objections to these or other requests, and (b) the right to revise, correct, amend, supplement, or modify these responses upon, among other things, the discovery of additional facts and materials, further investigation, and developments in this proceeding. Google therefore reserves the right to amend, supplement, or alter these responses as warranted during the course of discovery pursuant to Rule 26(e) of the Federal Rules of Civil Procedure. Google's amending, supplementing, or altering of responses in the future shall not waive Google's right to offer such information, documents, or things into evidence at trial or in other proceedings. Further, Google expressly preserves its right to rely on information omitted as a result of mistake or inadvertence.

7.   Google objects to CyWee's requests to the extent they call for a legal conclusion. Production by Google of a document shall not be construed to be an admission by Google that such document satisfies any particular legal characterization made by CyWee's requests.

8.   Google objects to requests for production of duplicative materials and/or of documents and things already in possession, custody, or control of CyWee or any other entities or persons under the control of CyWee.

9.   To the extent documents responsive to CyWee's requests include documents received from CyWee in the course of this litigation, Google will not produce such documents to CyWee. Google objects to doing so on the basis of undue burden and unnecessary duplication.

10. Any objection to a request or any offer to produce documents is not to be deemed an admission by Google that it possesses documents and things called for by such document request.

11. Google objects to CyWee's requests to the extent they seek information protected from discovery by the attorney-client privilege, work-product immunity, or any other applicable privilege(s), immunity(ies), or protection(s). Google uses the word "privilege" in these responses and objections to refer to each of the above grounds for protection from disclosure Nothing contained in Google's responses is intended to be, or in any way shall be deemed to be, a waiver of any such applicable privilege. Google has registered its privilege objections expressly as to each request that might reasonably be interpreted to encompass privileged information. To the extent that any other requests are construed to encompass privileged documents, Google hereby incorporates this General Objection.

12. An objection based on privilege should not be construed as a representation that responsive documents exist or existed. Such an objection indicates only that the request is of such a scope as to potentially embrace privileged documents.

13. Google objects to CyWee's requests to the extent they are vague, ambiguous, overly broad, unduly burdensome, not proportional to the needs of the case, seek information that is irrelevant to any claim or defense in this action, or would require Google to conduct an unreasonable search for responsive information, particularly to the extent that they seek the identification of "each," "any," or "all" documents, people, or information when representative information would be sufficient, and to the extent that they seek the production of drafts of documents when production of final versions of documents would be sufficient, thus attempting to require an unreasonably detailed and extensive search of all of Google's information and files.

Google also objects to CyWee's requests to the extent the burden or expense of the proposed discovery outweighs its likely benefit, considering the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the action, and the importance of the discovery in resolving the issues.

14.   Google objects to the production of documents prior to the entry of a protective order to prevent the disclosure or dissemination of confidential documents produced in this litigation. Google will not produce documents until a protective order is entered that adequately protects confidential documents and information.

15.   Google objects to the production of electronically stored information (ESI) prior to the entry of an ESI order in this litigation. Google will not produce ESI until an ESI order is entered, and Google's production will be subject to the terms of the ESI order.

SPECIFIC OBJECTIONS AND RESPONSES TO DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1: The Samsung Android software license agreement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Google objects to this request on the grounds and to the extent it seeks documents not relevant to any claim or defense in this action and not proportional to the needs of this action. Samsung is not a party to this litigation, and Samsung's products are not accused in this litigation. Google objects to this request on the grounds and to the extent it seeks information subject to a confidentiality obligation owed to a non-party to this case or includes the confidential information of a non-party. Google further objects to this Request to the extent that it seeks information referring or relating to products or features that are not specifically accused of infringement or activities beyond the scope of this case. Google objects to this request on the

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