

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

RFCYBER CORP.,	§	Case No. 2:20-cv-00274-JRG
	§	(LEAD CASE)
Plaintiff,	§	
	§	
v.	§	<u>JURY TRIAL DEMANDED</u>
	§	
GOOGLE LLC and GOOGLE PAYMENT	§	
CORP.,	§	
	§	
Defendants.	§	
	§	
RFCYBER CORP.,	§	Case No. 2:20-cv-00335-JRG
	§	(MEMBER CASE)
Plaintiff,	§	
	§	
v.	§	<u>JURY TRIAL DEMANDED</u>
	§	
SAMSUNG ELECTRONICS CO., LTD and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	

SUBPOENA AND NOTICE OF DEPOSITION OF NXP USA, CORP.

PLEASE TAKE NOTICE that pursuant to Rules 30(b)(6) and 45 of the Federal Rules of Civil Procedure, Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively, “Samsung”) will serve the attached subpoenas on NXP USA, Corp. (“NXP”).

The document subpoena requires NXP to produce the documents and things on or before July 6, 2021 at the offices of Greenberg Traurig, LLP, 4 Embarcadero Center, Suite 3000, San Francisco, CA 94111, or at such other time and place as may be mutually agreed upon by Samsung and NXP.

The deposition upon oral examination of NXP will occur on July 21, 2021 at 9:30 a.m. at the offices of Greenberg Traurig, LLP, 4 Embarcadero Center, Suite 3000, San Francisco, CA 94111, or at such other time and place as may be mutually agreed to by Samsung and NXP. The deposition will continue from day to day until completed, excluding Saturdays, Sundays, and holidays. The deposition will be taken before a court reporter or other person authorized by law to administer oaths, and it will be recorded by video, audio, and/or stenographic means. You are invited to attend the deposition.

Dated: June 21, 2021

Respectfully submitted,

By: /s/ Allan A. Kassenoff

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***Attorneys for Defendants Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.***

CERTIFICATE OF SERVICE

The undersigned certifies that on this 21st day of June 2021, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email.

/s/ Allan A. Kassenoff _____
Allan A. Kassenoff

UNITED STATES DISTRICT COURT
for the
Eastern District of Texas

RFCYBER CORP.)	
<i>Plaintiff</i>)	
v.)	Civil Action No. 2:20-cv-335-JRG (Member Case)
SAMSUNG ELECTRONICS AMERICA, INC., et al.)	
<i>Defendant</i>)	

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: NXP USA, Corp., 411 East Plumeria Drive, San Jose, CA 95134

(Name of person to whom this subpoena is directed)

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached Schedule A

Place: Greenberg Traurig LLP, 4 Embarcadero Center, Suite 3000, San Francisco, CA 94111 Attn: Allan Kassenoff	Date and Time: <p style="text-align: center;">07/06/2021 10:00 am</p>
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Inspection of Premises: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/22/2021

CLERK OF COURT

OR

/s/ Allan A. Kassenoff

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants
Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd., who issues or requests this subpoena, are:
Allan Kassenoff; 200 Park Avenue, New York, NY 10166; KassenoffA@gtlaw.com; 212-801-2157

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the

Civil Action No. 2:20-cv-335-JRG (Member Case)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____
_____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

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