

EXHIBIT 16

45. The correlation of internal and external name(s) and internal and external model number(s) of each HTC Accused Product with the yearly quarter sales, revenue, cost, profit, and pricing for each HTC Accused Product dating back to 2011.

46. The business relationship between Defendant and the suppliers of components to the HTC Accused Products, including but not limited to: the contents of any agreements signed between Defendant and the suppliers, including the effective date, terms, subject matter and/or termination of any such agreement; and, the number of HTC Accused Products, or components thereof, purchased from each supplier and the cost of purchasing or acquiring such components.

47. Any agreements, licenses, and contracts, including attachments or exhibits thereto, produced by Defendant for This Action.

48. The business structures of HTC Corporation, including without limitation the corporate structure and parent-subsidary relationship with other entities; the corporate officers of each entity within the parent-subsidary relationship of HTC Corporation; and the distribution of any income, revenues, profits, or other payments between each entity within the parent-subsidary relationship of HTC Corporation.

49. Any market surveys or studies regarding the Accused Instrumentalities, including but not limited to market surveys or studies regarding consumer preferences or demand in purchasing the Accused Instrumentalities with and without certain features of the HTC Accused Products and HTC Accused Technology.

50. The value that consumers attribute to any features of the HTC Accused Products and HTC Accused Technology.

51. Any advertisements, television and internet commercials, social media content, or other promotional materials related to the Accused Instrumentalities and any features of the Accused Instrumentalities;

52. The pricing and/or discounting of the Accused Instrumentalities including any research, analysis, and other materials used or involved in the determination of such pricing and discounting.

53. The first date on which each Accused Instrumentality was manufactured, sold, offered for sale, and/or imported into the U.S., and the last date if no longer manufactured, sold, offered for sale and/or imported into the U.S.

54. Defendant's awareness of and communications regarding *Advanced Ground Information Systems, Inc. v. Life360, Inc., Case No. 9:14-cv-80651-DMM (S.D. Fla.)*.

55. Defendant's awareness of, including the first awareness of, and communications regarding the Asserted Patents and any Related Patents.

56. Defendant's policies and practices relating to efforts to investigate or monitor patents that the HTC Accused Products may infringe.

57. Any patent licenses or covenants not to sue relating to the Accused Instrumentalities.

58. Defendant's responses to each of Plaintiff's interrogatories and exhibits thereto, including their content and how that content was gathered.

59. The document retention policies both before and after the filing of this action, including any policy regarding document creation, retention, and destruction related to electronic and/or physical documents.

60. The identities and locations of the persons likely to have knowledge of the foregoing topics.

61. The identities and locations of documents and things pertaining to the foregoing topics.

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