

Exhibit 7

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

GESTURE TECHNOLOGY PARTNERS, LLC, <p style="text-align: center;">Plaintiff</p> v. HUAWEI DEVICE CO., LTD., HUAWEI DEVICE USA, INC., <p style="text-align: center;">Defendants.</p>	<u>JURY TRIAL DEMANDED</u> C.A. NO. 2:21-cv-00040-JRG LEAD CONSOLIDATED CASE
SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC., <p style="text-align: center;">Defendants.</p>	C.A. NO. 2:21-cv-00041-JRG

**PLAINTIFF GESTURE TECHNOLOGY PARTNERS, LLC’S RESPONSES AND
OBJECTION TO DEFENDANTS’ FIRST SET OF INTERROGATORIES (NOS. 1-13)**

Pursuant to Federal Rule of Civil Procedure 26 and 33, Plaintiff Gesture Technology Partners, LLC (“GTP”) submits the following objections and responses to Defendants’ First Set of Interrogatories, served on September 1, 2021.

PRELIMINARY STATEMENT

These answers reflect only the current status of GTP’s knowledge, understanding, and belief regarding the matters about which inquiry has been made. Discovery in this litigation is continuing and, consequently, GTP may not have yet identified all information responsive to Defendants’ Interrogatories. As discovery in this case proceeds, GTP anticipates that it may therefore discover additional or different information or documents. These responses are further made with the current stage of the case in mind, with objection to interrogatories that are premature, seek expert discovery, and/or are impossible to discern or respond to. Without in any way obligating itself to do so, GTP reserves the right to amend, modify, supplement, clarify or also explain these objections and answers at any time in the future.

RESPONSE AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1

For each Asserted Claim of the Patents-in-Suit, describe the facts and circumstances of the conception, reduction to practice (including any alleged actual reduction to practice), and earliest effective filing date of the claimed invention, including, Identification of the earliest date by which the inventor(s) conceived the claimed invention; Identification of the earliest date by which the inventor(s) reduced to practice the claimed invention; any diligence towards reducing the claimed invention to practice; Identification of all Documents or other evidence Relating to any of the foregoing; and Identification of all persons with knowledge Relating to any of the foregoing.

OBJECTIONS AND RESPONES TO INTERROGATORY NO. 1

GTP incorporates its General Objections as if fully set forth herein.

GTP objects to Interrogatory No. 1 because its terms or phrases are vague, ambiguous, overly broad, unduly burdensome, irrelevant, not proportional, call for a legal conclusion, and/or undefined in the context of this Interrogatory, including without limitation “facts and circumstances,” “reduction to practice,” “earliest effective filing date,” and “diligence.” GTP objects to this Interrogatory because it seeks information that is obtainable by other forms of discovery that are more convenient and less burdensome, and is duplicative of other discovery in this case. GTP further objects to this Interrogatory because it contains information that is irrelevant and/or not proportional to the needs of this case. GTP objects to this Interrogatory because it is premature and calls for a legal conclusion. GTP also objects to this Interrogatory because it seeks information protected or otherwise exempt or immune from discovery, including without limitation, information protected from discovery by attorney-client privilege and/or work product

immunity, or information that is otherwise protected from disclosure. To the extent that this Interrogatory calls for an expert's testimony, report, and or opinion, GTP objects because such disclosure is premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Court.

Subject to and without waiving these and their General Objections, GTP responds to the non-objectionable portion of this Interrogatory as follows:

Dr. Pryor conceived the inventions a few months prior to the filings of U.S. Provisional Application No. 60/107,652, 60/142,777, and 60/133,671. Dr. Pryor constructively reduced to practice the inventions on those filing dates. Pursuant to Rule 33(d), information responsive to this Interrogatory may be also determined by examining documents produced by GTP, including GTP-0000001 – GTP-00000916. GTP will produce additional, non-privileged documents from which information responsive to this Interrogatory may be derived or ascertained, to the extent those documents are found after GTP's reasonable searches. GTP reserves all rights to amend, modify, and/or supplement this answer.

INTERROGATORY NO. 2

Identify each product designed, developed, manufactured, distributed, marketed offered for sale, or sold, whether in the United States or elsewhere, by You, any prior assignees or predecessors in interest, and/or any party licensed or otherwise authorized to practice any claim of the Patents-in-Suit, which You contend embodies or practices any claim of the Patents-in-Suit, including all facts and circumstances Relating to the foregoing; Identification of all Documents or

“legal and factual bases,” “induced or contributed,” “constitute,” “requisite intent,” and “facts and circumstances.” GTP objects to this Interrogatory on the ground that it is compound and contains at least six sub-parts. GTP objects to this Interrogatory because it seeks information that is obtainable by other forms of discovery that are more convenient and less burdensome. GTP further objects to this Interrogatory because it contains information that is irrelevant and/or not proportional to the needs of this case. GTP objects to this Interrogatory because it is premature and calls for a legal conclusion. GTP also objects to this Interrogatory because it seeks information protected or otherwise exempt or immune from discovery, including without limitation, information protected from discovery by attorney-client privilege and/or work product immunity, or information that is otherwise protected from disclosure. To the extent that this Interrogatory calls for an expert’s testimony, report, and or opinion, GTP objects because such disclosure is premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Court.

Subject to and without waiving these and their General Objections, GTP responds to the non-objectionable portion of this Interrogatory as follows:

GTP became aware of Defendants’ potential infringement as early as approximately September 2014. Discovery is ongoing, and GTP will supplement its answer to this Interrogatory at the completion of fact discovery.

Dated: October 1, 2021

Respectfully submitted,

By: /s/ Fred I. Williams

Fred I. Williams

Texas State Bar No. 00794855

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