

EXHIBIT I

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

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

HUAWEI DEVICE CO., LTD.,
HUAWEI DEVICE USA, INC.,

Defendants.

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CASE NO. 2:21-cv-00040-JRG
(Lead Case)

JURY TRIAL DEMANDED

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

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CASE NO. 2:21-cv-00041-JRG
(Member Case)

JURY TRIAL DEMANDED

**SAMSUNG DEFENDANTS' OBJECTIONS TO GESTURE TECHNOLOGY
PARTNERS, LLC'S DEPOSITION COUNTER-DESIGNATIONS**

Pursuant to the Fed. R. Civ. P. 26(a)(3)(B) and the Court's Sixth Amended Docket Control Order (Dkt. No. 155), Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby provide their objections to Gesture Technology Partners, LLC counter-designations.

Defendants make this disclosure without waiving any of their rights, including amending or supplementing in the future as appropriate for any reason. Defendants incorporate by reference their initial Trial Deposition Designations and Rebuttal Deposition Designations as counter-

designations. The objections are supplemental to any pending motions, including without limitation Defendants' motions to exclude, *Daubert* motions, motions to strike, and forthcoming motions *in limine*, and are not intended to limit the scope of any such motions.

Defendants generally object to any testimony insofar as it pertains to, or may be used in a manner that, on its face or as argued at trial is contrary to any of Defendants' motions to strike, *Daubert* motions, motions to strike, and/or motions *in limine*.

Defendants do not know the precise nature or scope of the testimony and evidence that Plaintiff may seek to present at trial. As such, Defendants reserve the right to modify, amend, or supplement their objections prior to or during trial including, by way of example and not of limitation, rulings by the Court including on any motion to strike, *Daubert* motions, summary judgment motions, and/or motions *in limine*, or any other case developments.

Defendants reserve the right to use any testimony set forth in Plaintiff's deposition designations for any purpose, notwithstanding any objections by Defendants to their use by Plaintiff for any purpose.

Defendants' objections use the following abbreviations:

Abbreviations	Objections
401, 402	Lacks relevance. Fed. R. Evid. 402.
403	Any probative value of the testimony is substantially outweighed due to a danger of unfair prejudice, misleading the jury, confusion of issues, undue delay, wasting time, or needlessly presenting cumulative evidence. Fed. R. Evid. Rule 403.
407	Improper question regarding subsequent remedial matters. Fed. R. Evid. 407.
408	Improper use of settlement offers or conducts / statements made during such discussions to prove validity or amount of disputed claim. Fed. R. Evid. 408
802	Hearsay. Fed. R. Evid. 802.
30b6	Outside the scope of 30(b)(6) witness's designated topics
AC	Attorney-client privilege, work product, or other applicable privilege applies. Fed. R. Evid. 502.
AQ	Attorney Colloquy
ARG	Argumentative Question
C	Compound Question
CO	The testimony contains confidential business information but is not properly labeled pursuant to the Protective Orders.
I	Incomplete
IO	Improper opinion testimony from a fact witness or improper expert opinion testimony. Fed. R. Evid. 701, 702.
L	Leading Question
LK	Testimony contains material that is not within the personal knowledge of any potential sponsoring witness(es). Fed. R. Evid. 602.
N	Narrative or Non-Responsive Answer
VA	Vague or Ambiguous Question
C/M	Confusing / Misleading

Jeongho Cho (Date of Deposition: 10/01/2021)

Samsung's Designations	Plaintiff's Objections	Plaintiff's Counter-Designations	Samsung's Objections
8:5-8:14	FRCP 32		
8:21-8:23	FRCP 32		
8:25-9:4	FRCP 32		
10:22-11:4	FRCP 32/401/402/403 – Irrelevant		
11:9-11:15	FRCP 32/401/402/403 – Irrelevant		
11:16-12:7	FRCP 32/401/402/403 – Irrelevant		
12:9-12:21	FRCP 32/401/402/403 – Irrelevant		
15:8-15:13	FRCP 32/401/402/403 – Irrelevant		
17:9-20:24	FRCP 32		
21:22-22:10	FRCP 32		
25:17-25:19	FRCP 32/401/402/403 – Irrelevant		
25:21-26:3	FRCP 32/401/402/403 – Irrelevant		
26:19-27:8	FRCP 32		
27:11-27:18	FRCP 32		
27:20-28:4	FRCP 32		
28:7-28:12	FRCP 32		
28:15-28:16	FRCP 32		
29:14-30:23	FRCP 32/401/402/403 – Irrelevant		
32:11-32:13	FRCP 32		
32:15-32:19	FRCP 32		
32:21-33:8	FRCP 32		
33:10-34:3	FRCP 32/401/402/403 – Irrelevant		
34:5-34:19	FRCP 32/401/402/403 – Irrelevant		
36:22-37:2	FRCP 32/401/402/403 – Irrelevant		
37:9-37:25	FRCP 32/401/402/403 – Irrelevant		
38:2-38:4	FRCP 32		
38:7-38:16	FRCP 32		
39:24-40:4	FRCP 32		

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