

EXHIBIT B

DEFINITIONS

The Definitions and Instructions from *Plaintiff's First Set of Interrogatories to Defendant WhatsApp, LLC (Nos. 1-9)*, served June 9, 2021, are incorporated herein by reference as if fully set forth in their entireties.

INTERROGATORIES

INTERROGATORY NO. 10

Identify all physical property, offices, facilities, coworking spaces, warehouses, tangible and intangible property, equipment, servers, data centers, and other physical locations located within all counties of the Eastern District of Texas and all counties adjacent to the Eastern District of Texas, that are leased, owned, or otherwise used by WhatsApp, any affiliate of WhatsApp, or any employees, consultants, or personnel of WhatsApp or any affiliate of WhatsApp. This request is limited to any lease or ownership in effect at any time during the period of 2017 to present or any use occurring at any time during the period of 2017 to present.

RESPONSE TO INTERROGATORY NO. 10

INTERROGATORY NO. 11

Identify and produce all past and present agreements, leases, contracts, and any legal rights for all physical property, offices, facilities, coworking spaces, warehouses, tangible and intangible property, equipment, servers, data centers, other physical locations, communications services, utility services, and all vendor services located or performed within all counties of the Eastern District of Texas and all counties adjacent to the Eastern District of Texas. This request is limited to agreements, leases, contracts, and legal rights effective at any time during the period of 2017 to present.

RESPONSE TO INTERROGATORY NO. 11

INTERROGATORY NO. 12

Identify all past and present employees, officers, directors, contractors, vendors, agents, and third parties of WhatsApp and its affiliates including, but not limited to, all Person(s) that reside in or work in any county of the Eastern District of Texas and any county adjacent to the Eastern District of Texas. This request is limited to the time period of 2017 to present.

RESPONSE TO INTERROGATORY NO. 12

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