EXHIBIT F

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OCEAN SEMICONDUCTOR LLC, Plaintiff, v. MEDIATEK INC. AND MEDIATEK USA INC., Defendants.	Case No. 6:20-cv-1210-ADA (Pending in W.D. Tex.) **NON-PARTY UNITED MICROELECTRONICS CORPORATION'S OBJECTIONS TO OCEAN SEMICONDUCTOR LLC'S SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

Pursuant to Rules 26, 30, 34 and 45 of the Federal Rules of Civil Procedure, non-party United Microelectronics Corporation ("UMC") hereby objects to the Subpoena to Testify at a Deposition in a Civil Action ("Subpoena") which was purportedly issued by Plaintiff Ocean Semiconductor LLC ("Ocean" or "Plaintiff") in the above-captioned action and transmitted by electronic mail to counsel for UMC on January 27, 2022. The Subpoena seeks deposition testimony from UMC on eleven Deposition Topics (each a "Topic" and collectively the "Topics") listed in Attachment A to the Subpoena, and production by UMC of documents, electronically stored information ("ESI"), or objects described in twenty-two Requests for Production of Documents (each a "Request" and collectively the "Requests") also listed in Attachment A.

PRELIMINARY STATEMENT

A.   UMC is a Taiwanese company having its headquarters in Hsinchu, Taiwan. Accordingly, UMC is beyond the subpoena power of United States courts, which have no jurisdiction over UMC for purposes of the Subpoena. Ocean failed to request and obtain issuance of a letter rogatory to the Appropriate Judicial Authority of Taiwan requesting their assistance in serving and enforcing the Subpoena, failed to provide a Chinese translation of the Subpoena, and failed to follow the other requirements under the Federal Rules of Civil Procedure, the United States Code, and Taiwan law for issuance of a subpoena to a Taiwanese entity. Moreover, Ocean's attempted service of the Subpoena by emailing an electronic copy to counsel for UMC is unauthorized under the Federal Rules of Civil Procedure and the United States Code, and is in contravention of Taiwan Law, and thus is improper and ineffective. Accordingly, UMC is under no obligation to respond to the Subpoena. Any production by UMC of information sought by the Subpoena would be entirely voluntary.

B.   Nothing in these objections, no production by UMC of information sought by the Subpoena, and no request by UMC for additional protections in the underlying action through entry of a supplemental protective order or other measures should be construed as an acceptance by UMC of service of the Subpoena, as a submission by UMC to the jurisdiction of any United States court, or as a waiver by UMC of any rights under applicable rules and governing laws, including any objections regarding improper and ineffective service or lack of jurisdiction.

C.   UMC's objections to a particular Request or Topic should not be interpreted as implying that documents responsive to the Request exist or that information covered by the Topic is known or reasonably available to UMC, or that UMC acknowledges the appropriateness of the Request or Topic.

D.   Any production by UMC of information sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC reserves the right to insist upon supplemental protections.

GENERAL OBJECTIONS

1.   UMC objects to the time, place, and manner specified in the Subpoena for appearing for a deposition and producing documents to the extent they are inconvenient and unduly burdensome to UMC. UMC will appear for a deposition and produce documents, if at all, at a time and location, and in a manner, to be agreed upon by UMC and Ocean.

2.   UMC objects to each Request and Topic to the extent it seeks to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure or any other applicable rule or law.

3.   UMC objects to each Request and Topic to the extent it seeks information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or immunity.

4.   UMC objects to each Request and Topic to the extent it seeks trade secret and/or other confidential research, development, or commercial information. Any production by UMC of information sought by the Subpoena will be made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC reserves the right to insist upon supplemental protections.

5.   UMC objects to each Request and Topic to the extent it seeks information not in UMC's possession, custody or control.

6.   UMC objects to each Request and Topic to the extent it seeks information that is available from one or more parties to the underlying action and/or from public sources.

7.   UMC objects to each Request and Topic to the extent it seeks information that is more readily and/or appropriately available from, or confidential to, another non-party.

8.   UMC objects to each Request and Topic to the extent it is duplicative of other discovery already taken or requested in the underlying action.

9.   UMC objects to each Request and Topic to the extent it seeks information that is not relevant to any party's claim or defense and proportional to the needs of the case.

10. UMC objects to each Request and Topic to the extent it is overbroad, vague and ambiguous, and/or imposes undue burden or expense upon UMC.

11. UMC objects to each Request and Topic to the extent it is not reasonably limited in time and scope.

12. UMC objects to each Request and Topic to the extent that responding or providing testimony would require subjective judgment and/or speculation on the part of UMC.

13. UMC objects to each Request and Topic to the extent that it calls for a legal conclusion.

OBJECTIONS TO DEFINITIONS

1. UMC objects to the definition of "UMC," "You," and "Your" as overbroad, vague and ambiguous, calling for a legal conclusion, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it covers entities and persons other than UMC. For purposes of these objections, UMC will interpret these terms to mean only United Microelectronics Corporation.

2. UMC objects to the definition of "Plaintiff," "Ocean Semiconductor," and "Ocean" as overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it covers entities and persons other than Ocean Semiconductor LLC. For purposes of these objections, UMC will interpret these terms to mean only Ocean Semiconductor LLC.

3. UMC objects to the definition of "ASML" as overbroad, vague and ambiguous, calling for a legal conclusion, providing insufficient identification and specificity, requiring subjective judgment and speculation, and seeking to impose duties or obligations beyond or inconsistent with those set forth in the Federal Rules of Civil Procedure, at least to the extent it covers entities and persons other than ASML Holding N.V. and ASML Netherlands B.V. For

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