

# EXHIBIT G

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

Ocean Semiconductor LLC,

*Plaintiff,*

v.

MediaTek Inc. and MediaTek USA Inc.  
("MediaTek"),

*Defendant.*

Civil Action No.: 6:20-cv-1210-ADA

**DEFENDANT MEDIATEK'S RESPONSES TO PLAINTIFF'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1-42)**

Pursuant to Rules 34 of the Federal Rules of Civil Procedure and the Local Rules, Defendants MediaTek Inc. and MediaTek USA Inc. (collectively, "MediaTek") hereby object and respond to Plaintiff Ocean Semiconductor LLC's ("Ocean") First Set of Requests for Production of Documents Nos. 1-42 (the "Requests") as follows.

**GENERAL OBJECTIONS AND QUALIFICATIONS**

The general objections and qualifications listed below are hereby incorporated by reference and made part of MediaTek's response to every request, regardless of whether they are or are not reiterated within the specific responses below.

1. MediaTek bases its objections and responses upon information presently available and will further supplement or amend these objections and responses as discovery progresses. Discovery is ongoing and MediaTek is still pursuing its investigation and analysis of the facts and law pertaining to this lawsuit and has not yet completed such investigation and analysis.

2. MediaTek responds to each Request as it interprets and understands each Request with respect to the issues in this lawsuit. If Ocean asserts a different interpretation of any

Request, MediaTek reserves the right to supplement or amend its responses or objections. Ocean's Requests also contain terms or phrases with specific legal significance. Neither MediaTek's objections nor responses, nor the production of documents or things in response to any request, are an admission or indication that such documents are relevant to any legal theory, or that any of the legal terms used have any applicability in their legal sense to any documents or things produced by MediaTek in response to the Requests. MediaTek objects to each Request that calls for legal conclusions or includes factual characterizations by Ocean. By responding, MediaTek does not accept or admit to the truth or accuracy of Ocean's factual characterizations.

3. Any response that indicates that MediaTek will produce documents or things should not be construed to mean that responsive documents in fact exist; only that, if such relevant, non-privileged, non-objectionable documents or things exist, are in MediaTek's possession, custody, or control, and are located after a reasonable search of the location or locations where responsive documents or things are likely to be located, such documents or things will be produced in a timely manner.

4. MediaTek objects to the Requests, and the Definitions and Instructions that accompany them, to the extent that they seek to impose obligations and demands on MediaTek greater than or more extensive than those required by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Western District of Texas, or any other applicable authority.

5. MediaTek objects to each Request that seeks production of "any," "each," "every," or "all" documents or things when a subset of documents or things will suffice to provide the requested information. The burden or expense of collecting the documents or things called for by any such Request outweighs its likely benefit.

6. MediaTek objects to each Request that calls for documents or things that are not within the possession, custody, or control of MediaTek.

7. MediaTek objects to each Request, and the Definitions and Instructions that accompany it, that requests that MediaTek creates or produces documents or things that MediaTek does not maintain in the ordinary course of its business, or that MediaTek create or produce documents or things in a particular format or at a particular level of detail that MediaTek does not maintain in the ordinary course of its business.

8. MediaTek objects to each Request that calls for production of documents or things that are publicly available or equally available to Ocean, and therefore are of no greater burden for Ocean to obtain than for MediaTek to obtain.

9. MediaTek objects to each Request that seeks documents or things that MediaTek is not permitted to disclose pursuant to confidentiality obligations to third parties or by court order. To the extent any such documents or things are responsive, relevant, and non-privileged, MediaTek will produce that information and/or those documents in accordance with the Court's standing protective order and after complying with its obligations to third parties and/or court orders.

10. MediaTek objects to each Request that seeks documents or things protected from disclosure by the attorney-client privilege, work product doctrine, common interest privilege, or any other privilege or immunity against disclosure (collectively, as used here, "privilege"). Nothing contained in these responses should be considered a waiver of any privilege. MediaTek does not intend to produce documents or things that would divulge any privileged information. Any such disclosure is inadvertent and shall not be deemed a waiver of any applicable privilege.

11. MediaTek objects to each Request as it is either (1) not limited as to time, in which case it is overly broad and unduly burdensome or (2) necessarily seeks information and documents that encompass time periods not relevant to the above-captioned action. Patentees may not recover under § 271(g) for any product in the possession of or in transit to the alleged infringer before notice of infringement. 35 U.S.C. § 287(b). Any Request seeking Information before October 2020, when Ocean sent its first demand letter to MediaTek, is therefore not relevant to any claim or defense in this action.

12. MediaTek objects to each Request, and the Definitions and Instructions that accompany them, that alters the plain meaning of any specific Request, on the ground that such alteration renders the request vague, ambiguous, overly broad, and/or unduly burdensome.

13. MediaTek objects to the Requests as premature to the extent that they call for documents or things that are the subject of expert testimony when the parties have not yet engaged in expert discovery or exchanged expert reports. MediaTek will produce such documents or things, if appropriate, in accordance with the applicable schedule in this case and/or any discovery and procedural stipulation between the parties governing this Action. MediaTek objects to these Requests to the extent they prematurely seek information related to MediaTek's contentions in this Action.

14. MediaTek objects to the Requests as unduly burdensome and not proportional to the to the needs of the case (considering the importance of the issues at stake in the action, the parties' access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit) to the extent they call for the search and production of email or other electronically stored information (ESI). Ocean has not shown good cause for any such request or

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