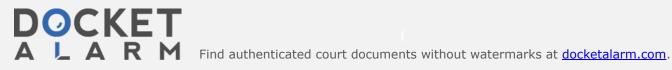
## **EXHIBIT C**

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5	Attorney for Non-Party UMC Group (USA)	
6	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
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9	OCEAN SEMICONDUCTOR LLC,	Case No. 6:20-cv-1210-ADA
10	Plaintiff,	(Pending in W.D. Tex.)
11	v.	NON-PARTY UMC GROUP (USA)'S OBJECTIONS AND RESPONSES TO
12	MEDIATEK INC. AND MEDIATEK USA	OCEAN SEMICONDUCTOR LLC'S SUBPOENA TO TESTIFY AT A
13	INC.,	DEPOSITION IN A CIVIL ACTION
14	Defendants.	
15		•
16	Pursuant to Rules 26, 30, 34 and 45 of the Federal Rules of Civil Procedure, non-party	
17	UMC Group (USA) hereby responds and objects to the Subpoena to Testify at a Deposition in a	
18	Civil Action ("Subpoena") which was issued by Plaintiff Ocean Semiconductor LLC ("Ocean"	
19	or "Plaintiff") in the above-captioned action and served on UMC Group (USA) at its offices in	
20	Sunnyvale, California on December 22, 2021. The Subpoena seeks deposition testimony from	
21	UMC Group (USA) on eleven Deposition Topics (each a "Topic" and collectively the "Topics")	
22	listed in Attachment A to the Subpoena, and production by UMC Group (USA) of documents,	
23	electronically stored information ("ESI"), or objects described in forty-five Requests for	
24	Production of Documents (each a "Request" and collectively the "Requests") also listed in	
25	Attachment A.	
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27		



#### PRELIMINARY STATEMENT

- A. The following objections and responses are based on UMC Group (USA)'s current knowledge, information and belief after making a reasonable inquiry within the time allotted by the Subpoena. UMC Group (USA)'s investigation into this matter is ongoing, and UMC Group (USA) is willing to meet and confer with Ocean regarding the scope of the documents and deposition testimony sought. UMC Group (USA) reserves the right to supplement its objections and responses to the Subpoena to the extent additional or different information becomes available.
- B. UMC Group (USA)'s objections and response to a particular Request or Topic shall 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 Group (USA), or that UMC Group (USA) acknowledges the appropriateness of the Request or Topic. Nothing in these objections or responses should be construed as a waiver of any rights of UMC Group (USA) under applicable rules and governing laws.
- C. Any production of information by UMC Group (USA) in response to the Subpoena will made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.
- D. UMC Group (USA)'s offices are located within the Northern District of California, not within the Western District of Texas where the underlying action is pending. Pursuant to Federal Rule of Civil Procedure 45, the United States District Court for the Northern District of California is the governing district for purposes of the Subpoena and any related motions. Nothing in these objections and responses, and no request by UMC Group (USA) for additional protections through entry of a supplemental protective order, should be construed as a waiver of the jurisdiction of the Northern District of California.



### **GENERAL OBJECTIONS**

- 1. UMC Group (USA) 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 Group (USA). UMC Group (USA) 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 Group (USA) and Ocean.
- 2. UMC Group (USA) 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, the Civil Local Rules of the United States District Court for the Northern District of California, or any other applicable rule or law.
- 3. UMC Group (USA) objects to each Request and Topic 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 Group (USA) objects to each Request and Topic to the extent it seeks trade secret and/or other confidential research, development, or commercial information. Any production of information by UMC Group (USA) in response to the Subpoena will made pursuant to the Protective Order governing the disclosure of confidential information in the underlying action. UMC Group (USA) reserves the right to insist upon supplemental protections.
- 5. UMC Group (USA) objects to each Request and Topic to the extent it seeks information not in UMC Group (USA)'s possession, custody or control.
- 6. UMC Group (USA) 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 Group (USA) 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 Group (USA) 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 Group (USA) 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 Group (USA) objects to each Request and Topic to the extent it is overbroad, vague and ambiguous, and/or imposes undue burden or expense upon UMC Group (USA).
- 11. UMC Group (USA) objects to each Request and Topic to the extent it is not reasonably limited in time and scope.
- 12. UMC Group (USA) 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 Group (USA).
- 13. UMC Group (USA) objects to each Request and Topic to the extent that it calls for a legal conclusion.

## **OBJECTIONS TO DEFINITIONS**

- 1. UMC Group (USA) 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 Group (USA). For purposes of these objections and responses, UMC Group (USA) will interpret these terms to mean only UMC Group (USA).
- 2. UMC Group (USA) 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



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