

EXHIBIT F

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**

9 OCEAN SEMICONDUCTOR LLC,

10 Plaintiff,

11 v.

12 MEDIATEK INC. AND MEDIATEK USA
13 INC.,

14 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**

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

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PRELIMINARY STATEMENT

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

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

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

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

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GENERAL OBJECTIONS

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

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

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

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

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

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

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

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

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

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