

# EXHIBIT UU

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

GENTEX CORPORATION and INDIGO  
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

FACEBOOK, INC. and FACEBOOK  
TECHNOLOGIES, LLC,

Defendants.

Case No.: 6:21-cv-00755-ADA

**JURY TRIAL DEMANDED**

**PLAINTIFFS GENTEX CORPORATION AND INDIGO TECHNOLOGIES, LLC'S  
OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST SET OF VENUE-  
RELATED REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1-5) TO  
PLAINTIFFS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Gentex Corporation and Indigo Technologies, LLC (collectively, "Plaintiffs"), by undersigned counsel, hereby object and respond as follows to Defendants' First Set of Venue-Related Requests for Production of Documents.

**GENERAL OBJECTIONS & OBJECTIONS TO DEFINITIONS**

Plaintiffs provide the following General Objections and Objections to Definitions. These objections form a part of, and are hereby incorporated into, the response to each and every request for production set forth below. Nothing in those responses, including any failure to recite a specific objection in response to a particular request, should be construed as a waiver of any of these General Objections and Objections to Definitions.

1. Plaintiffs object to each request for production, definition, and instruction generally to the extent that it purports to impose obligations or responsibilities different from or in excess of those imposed by the Federal Rules of Civil Procedure, the Order Governing Proceedings, and the Local Rules of the United States District Court for the Western District of Texas. Plaintiffs will interpret and respond to the requests for production in good faith and in accordance with the Rules.

2. Plaintiffs object to any part of the requests for production, including the instructions and definitions contained therein, calling for the disclosure of information or documents that are privileged or otherwise protected from discovery pursuant to the attorney-client privilege, the accountant-client privilege, the common-interest privilege, the work product doctrine, or any other applicable privilege, protection, or immunity. Plaintiffs do not agree to provide such information or documents protected from discovery and will withhold or redact information or documents on that basis. If protected information or documents are inadvertently provided in response to the requests for production, the production of such information or documents shall not constitute a waiver of Plaintiffs' rights to assert the applicability of any privilege, protection, or immunity to the information or documents, to seek the return of such material, or to object to the use of such material at any stage of the action or in any other action or proceeding. Plaintiffs will meet and confer with Defendants regarding the appropriate form for a privilege log, and object to any instruction in these requests for production that purports to impose on Plaintiffs any obligation to provide information in a privilege log in excess of those imposed by the Federal Rules of Civil Procedure, the Order Governing Proceedings, and the Local Rules of the United States District Court for the Western District of Texas.

3. Plaintiffs object to each request for production, including the instructions and definitions contained therein, to the extent it seeks documents or information that are not in Plaintiffs' possession, custody, or control, including to the extent they seek documents or information that are in the possession, custody, or control of third parties, including the named inventors of the asserted patents and Thales Visionix, Inc. Plaintiffs will respond only with documents or information that are currently in their possession, custody, or control.

4. Plaintiffs object to each request for production, including the instructions and definitions contained therein, to the extent it purports to impose any obligation on Plaintiffs to provide information regarding any documents not currently in Plaintiffs' possession, custody, or control that is in excess of the obligations imposed by the Federal Rules of Civil Procedure, the Order Governing Proceedings, and the Local Rules of the United States District Court for the Western District of Texas. This includes, but is not limited to, documents that were but are no longer in Plaintiffs' possession, custody, or control; documents that may have been lost or destroyed before the initiation or anticipation of any litigation; and documents believed to be in the possession of a Third Party.

5. Plaintiffs object to each request for production, including the instructions and definitions contained therein, to the extent that it calls for disclosure of trade secret, proprietary, personal, commercially sensitive, third-party confidential, or other confidential information. Plaintiffs will only disclose confidential information, including trade secret, proprietary, personal, commercially sensitive, third-party confidential, or other confidential information, that is responsive, relevant, and not otherwise protected, pursuant to any Protective Order governing this action.

6. Plaintiffs object to each request for production, including the instructions and definitions contained therein, to the extent that it seeks “any,” “all,” or “every” document(s) responsive to the request. Such demands are unduly burdensome and overly broad, and they seek documents that are not relevant to the claim or defense of any party or proportional to the needs of the case (in accordance with Fed. R. Civ. P. 26(b)(1)). Plaintiffs will conduct a reasonable and diligent search of reasonably accessible files, limited to the non-custodial sources and custodians identified by Plaintiffs, agreed to by the parties, or ordered by the Court. Absent such agreement or order, Plaintiffs will not search for or produce documents from any other source or location. Similarly, Plaintiffs object to each request for production, definition, and instruction as overly broad and unduly burdensome to the extent that it purports to require Plaintiffs to search for and produce electronic documents without reasonable limitations upon the scope of information to be searched or the content of the material to be searched for. Plaintiffs will only produce electronic documents as specifically indicated in their responses and/or in accordance with an electronically stored information (“ESI”) protocol that the parties eventually agree to govern this action. To the extent that Defendants’ requests for production conflict with the ESI protocol, Plaintiffs will comply with the ESI protocol. Plaintiffs further object to each definition, instruction, and request for production to the extent that it seeks information that is unreasonably cumulative or duplicative, that is publicly available, that is already known to Defendants or Defendants’ counsel, that is of no greater burden for Defendants to ascertain than Plaintiffs, or that is ascertainable from some other source that is more convenient, less burdensome, or less expensive, that is otherwise more appropriately obtained from another party, and/or to the extent that compliance would be unduly burdensome, expensive, or oppressive. Unless otherwise indicated specifically below, Plaintiffs will not provide such information.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.