

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Stratasys, Inc.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	Case No. 2:24-cv-00644-JRG
Shenzhen Tuozhu Technology Co., Ltd., <i>et</i>	§	(Lead Case)
	§	
<i>al.,</i>	§	
	§	
<i>Defendants.</i>	§	

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Stratasys, Inc.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Case No. 2:24-cv-00645-JRG
	§	(Member Case)
Shenzhen Tuozhu Technology Co., Ltd., <i>et</i>	§	
	§	
<i>al.,</i>	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF’S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO  
DEFENDANTS’ FIRST SET OF INTERROGATORIES (Nos. 1-21)**

Pursuant to Rule 26 and 33 of the Federal Rules of Civil Procedure and the Discovery Order of this Court, Plaintiff Stratasys, Inc. (“Stratasys”) serves the following supplemental objections and responses to Defendants’ Shenzhen Tuozhu Technology Co., Ltd., Shanghai Lunkuo Technology Co., Ltd., Bambulab Limited, and Tuozhu Technology Limited (collectively “Defendants” or “Bambu”) First Set of Interrogatories. The supplemental objections and responses are based upon information presently available to, and identified by, Stratasys after reasonable inquiry. As discovery proceeds, facts, information, evidence, documents, and things may be

discovered that are not set forth in this response and that may be responsive to these interrogatories. Stratasys's responses are provided without prejudice to Stratasys's right to revise and/or supplement the responses. Accordingly, Stratasys's responses shall not be deemed to constitute admissions or representations that any statement or characterization is complete.

Stratasys's responses to these interrogatories are made without waiving or intending to waive questions as to authenticity, competence, relevance, materiality, or admissibility. Stratasys further preserves its right to object on any ground to the use of any information or documents provide or referenced herein, or the subject matter thereof. Production of privileged documents or information by Stratasys shall not constitute a waiver of any applicable privilege, including a subject matter waiver, regardless of whether such production is inadvertent or otherwise.

Specific objections to each of these Interrogatories are made on an individual basis in the responses below. In addition to these specific objections, Stratasys makes certain objections applicable to each interrogatory and/or to the interrogatories as a whole and including the definitions and instructions incorporated therein ("General Objections"). These General Objections are hereby incorporated by reference into the responses made with respect to each separate Interrogatory. For particular emphasis and clarity, Stratasys has, from time to time, expressly included one or more of the General Objections in certain of its responses below.

Subject to the foregoing, Stratasys responds and object as follows

### **GENERAL OBJECTIONS**

The following General Objections apply to each and every Interrogatory and are incorporated into each individual Objection as if set forth fully therein:

1. Stratasys objects to the Definitions, Instructions, and Interrogatories to the extent that they seek to impose any requirements or obligations on Stratasys in addition to or different from those imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court, any

applicable orders of this Court, or any stipulation or agreement of the parties. Stratasys further objects to the Definitions and Instructions to the extent that they purport to alter the plain meaning and/or scope of any specific request, to the extent that such alteration renders the request vague, ambiguous, and/or overbroad.

2. Stratasys objects to the definition of “Plaintiff,” “You,” “Your,” and “Stratasys” as overbroad and not proportional to the needs of this case with respect to its inclusion of “any present and former agents, officers, directors, employees, affiliates, investigators, trustees, consultants, advisors, accountants, attorneys and all other persons or entities acting or purporting to act on Your behalf and Your affiliates, parents, divisions, joint ventures, licensees, franchisees, assigns, predecessors and successors in interest, and any other legal entities, whether foreign or domestic, that are owned or controlled by Stratasys.” For example, Stratasys objects to this definition to the extent it purports to impose discovery obligations on entities or people not parties to this lawsuit, including individuals and entities over which Stratasys does not exercise control. Stratasys provides these responses, and will search for and produce documents, only on behalf of Plaintiff Stratasys, Inc. Thus, for purposes of these responses and objections, Plaintiff will interpret “Plaintiff,” “You,” “Your,” and “Stratasys” to include only Stratasys, Inc. and agents thereof. Stratasys further objects to the extent the definition purports to impute knowledge of unspecified or unknown parties or persons to Stratasys and to the extent it purports to include Stratasys’s attorneys.

3. Stratasys objects to the definition of “Related Patent” as burdensome, unduly prejudicial, and overbroad to the extent it seeks discovery that is not relevant to any party’s claim or defense and proportional to the needs to the case.

4. Stratasys objects to the definition of “Related Technology” as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties’ relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys’s possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

5. Stratasys objects to the definition of “relate,” “relates to,” “related to,” and “relating to” as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties’ relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys’s possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

6. Stratasys objects to the definitions of “document” and “thing” or “things” as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case,

considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys's possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

7. Stratasys objects to the definitions of "correspondence" and "communication" as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys's possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

8. Stratasys objects to the definition of "person" or "persons" as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys's possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

9. Stratasys objects to the definition of "employee" as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys's possession, custody, or control or that are protected by the attorney-client privilege, work product doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

10. Stratasys objects to the definitions of "identify" and "to identify" as overly broad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is not relevant to any claim or defense of any party or that is not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative 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 (particularly with respect to the inclusion of documents that are not within Stratasys's possession, custody, or control or that are protected by the attorney-client privilege, work product

doctrine, or other applicable protection). Stratasys will respond in accordance with its obligations under the applicable rules governing this litigation.

11. Stratasys object to each interrogatory that purports to call for information or the production of documents protected from discovery by the attorney-client privilege, work-product doctrine, and/or common interest privilege, limitations on discovery of experts imposed by Federal Rule of Civil Procedure 26(b)(4), or any other applicable privilege or immunity. Because privileged material and trial preparation materials are not within the scope of discovery under Rule 26(b), Stratasys will withhold production of any such materials otherwise called for in these interrogatories unless otherwise clearly stated. Stratasys further objects to identifying documents protected by privileges, immunities, or limitations on discovery that were generated since the beginning of this litigation, as such identification is unlikely to lead to the discovery of admissible evidence and is likely to reveal work product and/or attorney-client privileged information. Stratasys further states that to the extent that any information protected by any privilege, immunity, or limitation is inadvertently provided in these responses, such provision shall not constitute waiver of the privilege, immunity, or limitation as to any such information.

12. Stratasys objects to each interrogatory that seeks confidential and/or proprietary business information of Stratasys or third parties, including confidential technical and/or financial information, to the extent it violates the Protective Order entered in this case. Stratasys will produce confidential technical and/or financial information subject to that Protective Order. Further, Stratasys will not disclose third-party confidential information without the necessary consents from any such third party.

13. Stratasys objects to interrogatories that call for Stratasys to produce or otherwise analyze documents or other information that are not in Stratasys's possession, custody, or control,

such as documents that are in the possession, custody, or control of third parties and not Stratasys, that are already in the possession, custody, or control of Defendants, or that are more readily available to Defendants than to Stratasys. Stratasys also objects to interrogatories that call for information that is not kept by Stratasys in the ordinary course of business.

14. Stratasys objects to interrogatories to the extent they seek to impose an obligation on Stratasys to disclose information that is publicly available and/or as easily obtained by parties other than Stratasys or that is more appropriately obtained through sources other than interrogatories on the grounds that such discovery is overly broad and unduly burdensome. Stratasys further objects to the interrogatories to the extent that they seek information or documents that are already known to or in the possession of Defendants.

15. Stratasys objects to the Definitions, Instructions, and Interrogatories to the extent they use terms that are not defined or understood, or are vaguely or ambiguously defined, and therefore fail to identify with reasonable particularity the information sought.

16. Stratasys objects to interrogatories to the extent they ask Stratasys to speculate or ask for a legal conclusion.

17. Stratasys objects to the Definitions, Instructions, and Interrogatories as vague and ambiguous to the extent to which the meaning may depend on the construction of legal instruments that have not yet been construed by the Court. Stratasys reserves the right to supplement its responses based on any such legal construction by the Court.

18. Stratasys objects to the Definitions, Instructions, and Interrogatories to the extent that they seek to shift the burden of proof or the burden of production with respect to the claims and defenses of this litigation. Stratasys's failure to respond, in whole or in part, to each and every contention raised by Defendants is not and shall not be taken as an admission by Stratasys that

those contentions are correct, nor does it relieve Defendants of their burden of production or to proof with respect to any claims and affirmative defenses they have or will assert in this litigation.

19. Stratasys objects to interrogatories to the extent the individual interrogatories are compound and therefore render the set of interrogatories unclear and/or unduly burdensome.

20. Stratasys objects to each interrogatory to the extent that it seeks the identification of “any,” “each,” “every,” or “all” documents, products, persons, circumstances, companies, entities, facts, or other things concerning a particular subject, as unduly burdensome, overbroad, and not proportional to the needs of the case. Stratasys reserves the right to revise and/or supplement each of the responses provided herein as new facts, evidence, and analysis become available to Stratasys.

21. Stratasys objects to each interrogatory to the extent it is not limited in time.

22. Stratasys objects to the interrogatories to the extent they are premature and request that Stratasys set forth its contentions, respond to a question of law, or require an expert opinion.

23. Stratasys objects to the Definitions, Instructions, and Interrogatories to the extent they are duplicative, cumulative, compound, or contain multiple subparts in violation of Fed. R. Civ. P. 33.

24. Stratasys objects to interrogatories to the extent that they exceed the permissible number of interrogatories allowed in this case, including all parts and subparts.

25. Stratasys objects to the Definitions, Instructions, and Interrogatories to the extent that they seek disclosure of information or documents: (1) not relevant to the subject matter of the case; (2) not proportional to the needs of the case; (3) where the burden or expense outweighs its likely benefit; (4) without providing a reasonable time period for information sought; or (5) otherwise beyond the scope of relevant discovery.

26. Consistent with Fed. R. Civ. P. 33(d), Stratasys objects to providing narrative responses to these Interrogatories where the information sought can be derived from documents produced by Stratasys and where the burden to derive such information from those documents is substantially the same for Defendants as it is for Stratasys.

### **SUPPLEMENTAL OBJECTIONS AND RESPONSES TO INTERROGATORIES**

Subject to the foregoing General Objections and reservation of rights, as well as the Specific Objections set forth below, Stratasys supplements its responses to Defendants' First Set of Interrogatories to Plaintiff (Nos. 1-21) as follows:

#### **INTERROGATORY NO. 1.**

Describe in complete detail the factual and legal basis and supporting evidence for what Plaintiff contends to be the date of invention (*i.e.*, conception, actual and constructive reduction to practice, and any diligence leading to reduction to practice) for each claim of any Asserted Patent. Your Response should include at least the date(s) and circumstances evidencing due diligence in reduction to practice following conception; the identity of all Persons with knowledge of such date(s); and the facts believed by You to be known by each Person identified.

#### **RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail the factual and legal basis and supporting evidence," it includes non-asserted claims, and it purports to require Stratasys to

identify “all Persons with knowledge of such date(s); and the facts believed by You to be known by each Person identified.” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys further objects to this interrogatory as compound. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis, including the conception and reduction to practice for each claim of any Asserted Patent. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive to this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

The asserted claims of the Asserted Patents have dates of invention at least as early as the following:

- U.S. Patent No. 9,421,713: May 23, 2011.
- U.S. Patent No. 9,592,660: December 17, 2014.
- U.S. Patent No. 7,555,357: October 18, 2004.
- U.S. Patent No. 9,168,698: October 29, 2012.
- U.S. Patent No. 10,556,381: October 29, 2012.
- U.S. Patent No. 10,569,466: October 29, 2012.
- U.S. Patent No. 11,167,464: October 29, 2012.
- U.S. Patent No. 8,747,097: August 18, 2010.
- U.S. Patent No. 11,886,774: December 31, 2014.
- U.S. Patent No. 8,562,324: August 18, 2010.

Pursuant to Fed. R. Civ. P. 33(d), Stratasys also refers Defendants to: SSYSBL000002242–SSYSBL000002357, SSYSBL000002394–SSYSBL000002451, SSYSBL000002470–SSYSBL000002562. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys’s investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

Stratasys maintains its objections to this interrogatory, including its objection to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court’s claim construction order has issued. Pursuant to Fed. R. Civ. P. 33(d), in addition to the documents

identified above, Stratasys also refers Defendants to: SSYSBL000010869–SSYSBL000010873. Stratasys will continue to supplement its response as additional information is discovered, pursuant to its obligations under Federal Rules of Civil Procedure 26(e)(1) and 33.

**INTERROGATORY NO. 2.**

Describe in complete detail the circumstances surrounding the conception and reduction to practice for each Asserted Claim. Your Response should include the identity of all Persons with knowledge of the circumstances surrounding the conception and reduction to practice for each Asserted Claim, and a description of the contributions of each such Person, and should identify by Bates number all Documents You contend show the existence of such conception and reduction to practice.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail the circumstances surrounding the conception and reduction to practice of each Asserted Claim,” to identify “all Persons with knowledge of the circumstances surrounding the conception and reduction to practice for each Asserted Claim,” and to “identify by Bates number all Documents You contend show the existence of such conception and reduction to practice.” Stratasys further objects to this interrogatory as irrelevant and overly broad, and thus unduly burdensome, to the extent it seeks information regarding conception and reduction to practice for Asserted Patents for which Stratasys has not

asserted a priority date preceding the earliest effective filing date. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis, including the conception and reduction to practice for each Asserted Claim. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court's scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive to this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys also objects to this interrogatory as unduly burdensome and duplicative to the extent it seeks overlapping information as Defendants' Interrogatory No. 1.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys incorporates-by-reference its response to Defendants' Interrogatory No. 1 in full. Stratasys identifies Thomas Studanski as having information related to the conception of the '357 Patent and the '713 Patent. Pursuant to Fed. R. Civ. P. 33(d), Stratasys also refers Defendants to: SSYSBL000002242–SSYSBL000002357; SSYSBL00000201–SSYSBL000000841, SSYSBL000001034–SSYSBL000002241. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

Stratasys maintains its objections to this interrogatory. Pursuant to Fed. R. Civ. P. 33(d), in addition to the documents identified above, Stratasys also refers Defendants to: SSYSBL000010869–SSYSBL000010873. Stratasys will continue to supplement its response as additional information is discovered, pursuant to its obligations under Federal Rules of Civil Procedure 26(e)(1) and 33.

**INTERROGATORY NO. 3.**

Identify, and describe in complete detail, the contribution of each named inventor to each Asserted Claim. Your response should identify by Bates number all documents you contend support such contributions, and should specify the specific contribution supported by each document.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or

should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail” and “identify by Bates number all documents you contend support such contributions, and should specify the specific contribution supported by each document.” Stratasys further objects to this interrogatory as seeking information irrelevant to any triable issue of fact in this case. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis, including the conception of each Asserted Claim. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys also objects to this

interrogatory as unduly burdensome and duplicative to the extent it seeks overlapping information as Defendants' Interrogatory No. 1.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Pursuant to Fed. R. Civ. P. 33(d), Stratasys refers Defendants to: SSYSBL000002242–SSYSBL000002357, SSYSBL000002358–SSYSBL000002562. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:**

Stratasys maintains its objections to this interrogatory. Despite Stratasys's objection to this interrogatory as seeking information irrelevant to any triable issue of fact in this case, Defendants have failed to explain how the full scope of the information requested by this interrogatory relates to the claims or defenses in this action.

Each inventor on the face of each Asserted Patent contributed to at least one claim of the patent, as evidenced by oath(s), declaration(s), and/or statement(s) that were filed with the United States Patent and Trademark Office and incorporated into the file wrapper of the patent. Stratasys has provided evidence relating to the conception and reduction to practice of U.S. Patent Nos. 7,555,357 and 9,421,713, the only Asserted Patents which Stratasys contends were conceived earlier than the related application dates listed on the face of each Asserted Patent.

Pursuant to Fed. R. Civ. P. 33(d), in addition to the documents identified above, Stratasys refers Defendants to: SSYSBL000010869–SSYSBL000010873. Stratasys will continue to

supplement its response as additional information is discovered, pursuant to its obligations under Federal Rules of Civil Procedure 26(e)(1) and 33.

**INTERROGATORY NO. 4.**

Identify the priority date to which each Asserted Claim is allegedly entitled, and your basis for asserting such priority date, including by identifying the supporting disclosure in each earlier application upon which you are asserting priority on an element-by-element basis in each Asserted Claim.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature because it requests information that requires expert opinion and analysis. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court's scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege.

Information or materials responsive to this interrogatory will be withheld pursuant to these privileges. Stratasys also objects to this interrogatory as unduly burdensome and duplicative to the extent it seeks overlapping information as Defendants' Interrogatory Nos. 1 to 3.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys incorporates-by-reference its response to Defendants' Interrogatory No. 1 in full. The asserted claims of the Asserted Patents are entitled to at least the following priority dates:

- U.S. Patent No. 9,421,713: May 23, 2011.
- U.S. Patent No. 9,592,660: December 17, 2014.
- U.S. Patent No. 7,555,357: October 18, 2004.
- U.S. Patent No. 9,168,698: October 29, 2012.
- U.S. Patent No. 10,556,381: October 29, 2012.
- U.S. Patent No. 10,569,466: October 29, 2012.
- U.S. Patent No. 11,167,464: October 29, 2012.
- U.S. Patent No. 8,747,097: August 18, 2010.
- U.S. Patent No. 11,886,774: December 31, 2014.
- U.S. Patent No. 8,562,324: August 18, 2010.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:**

Stratasys maintains its objections to this interrogatory, including as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery

is still at its early stages and before the Court's claim construction order has issued. Further, Stratasys incorporates-by-reference its first supplemental response to Defendants' Interrogatory No. 1 in full.

**INTERROGATORY NO. 5.**

Identify all Prior Art considered by Plaintiff or its attorneys in connection with any Asserted or Related Patent, anything alleged by anyone (*e.g.*, examiners, potential or actual licensees, accused infringers, or Your attorneys, employees, or agents) to be Prior Art to any Asserted or Related Patent, and all Prior Art known to Plaintiff or its attorneys in the field of three-dimensional printing.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys also objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to identify "all Prior Art considered by Plaintiff or its attorneys in connection with any . . . Related Patent, anything alleged by anyone (*e.g.*, examiners, potential or actual licensees, accused infringers, or Your attorneys, employees, or agents) to be Prior Art to any Asserted or Related Patent, and all Prior Art known to Plaintiff or its attorneys in the field of three-dimensional printing." Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to the extent this interrogatory calls for information

protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive to this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody, or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Pursuant to Fed. R. Civ. P. 33(d), Stratasys refers Defendants to: SSYSBL000000001–SSYSBL000002241, SSYSBL000002358–SSYSBL000002562. Stratasys also refers Defendants to the prior art identified by the Defendants in the pending *inter partes* reviews. See PTAB-IPR2025-00321; PTAB-IPR2025-00257; PTAB-IPR2025-00531; PTAB-IPR2025-00532; PTAB-IPR2025-00438; PTAB-IPR2025-00585; PTAB-IPR2025-00354; PTAB-IPR2025-00311. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

#### **INTERROGATORY NO. 6.**

Describe in complete detail the factual and supporting evidence, on an element-by-element basis, for Your contention that any claim element or combination of elements is directed to a specific implementation of a solution to a technical problem or recites one or more inventive concepts under 35 U.S.C. § 101 and *Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 573 U.S. 208 (2014), and its progeny. Your answer should include a recitation of all factual disputes You contend exist with respect to whether the elements of the Asserted Claims are not abstract or were not well-understood, routine, or conventional as of the priority date of each Asserted Patent.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail the factual and supporting evidence....” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court’s claim construction order has issued. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys

objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys objects to this interrogatory as irrelevant and premature as Defendants have not set forth a prima facie case of invalidity and improperly attempt to shift the burden of proving validity to Stratasys. Stratasys further objects to this interrogatory to the extent it seeks a legal conclusion.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

None of the Asserted Claims are ineligible under 35 U.S.C. § 101 for any of the reasons set forth in Defendants' invalidity contentions. Pursuant to 35 U.S.C. § 282, the Asserted Claims are presumed valid. Defendants bear the burden of proving, by clear and convincing evidence, that the Asserted Claims are invalid, which they have not done.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

#### **INTERROGATORY NO. 7.**

Describe in complete detail the factual and legal basis and supporting evidence for any secondary indicia of non-obviousness (*e.g.*, alleged copying of the invention by Defendants or others, failure of others, long felt need, unexpected results, commercial success, skepticism of experts, industry acclaim or acquiescence of competitors) Plaintiff contends exists relating to any claim of any Asserted Patent.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail the factual and legal basis and supporting evidence” and “relating to any claim.” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court’s claim construction order has issued. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for

Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys objects to this interrogatory as irrelevant and premature as Defendants have not set forth a prima facie case of invalidity and improperly attempt to shift the burden of proving validity to Stratasys. Stratasys further objects to this interrogatory to the extent it seeks a legal conclusion.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

None of the Asserted Claims are invalid, including based on obviousness under 35 U.S.C. § 103 for any of the reasons set forth in Defendants' invalidity contentions. Pursuant to 35 U.S.C. § 282, the Asserted Claims are presumed valid. Defendants bear the burden of proving, by clear and convincing evidence, that the Asserted Claims are invalid, which they have not done.

To the extent Defendants contend that the Asserted Claims are invalid as obvious, various secondary considerations evidence that the Asserted Claims were non-obvious, including a long-felt but unresolved need, skepticism, commercial success and industry application, industry recognition and praise, unexpected results, copying of the invention by others, and failure of others.

For example, Stratasys, including its inventors and executives, has received numerous awards for its innovative 3-D printing technologies, including but not limited to the awards described in the following: SSYSBL000002580–SSYSBL000002651.

Stratasys will rely on expert testimony to support secondary considerations of non-obviousness of the Asserted Patents, and Stratasys will make the required disclosures pursuant to the Federal Rules of Civil Procedure and the Federal Rules of Evidence at the appropriate time pursuant to the scheduling order.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 7:**

Stratasys maintains its objections to this interrogatory, including its objection to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court's claim construction order has issued. Defendants have requested that Stratasys supplement its response, despite this interrogatory being premature. Pursuant to Fed. R. Civ. P. 33(d), in addition to the documents identified above, Stratasys refers Defendants to: SSYSBL000010874–SSYSBL000014262.

**INTERROGATORY NO. 8.**

Describe in complete detail each instance in which Plaintiff became aware of any Person or Entity infringing any claim of any Asserted or Related Patent, including how and when Plaintiff became aware and any resulting action Plaintiff took in response.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail each instance in which Plaintiff became aware of any Person or Entity infringing any claim . . . including how and when Plaintiff became aware and any resulting action Plaintiff took in response” and includes “Related Patent[s].” Stratasys also objects to this

interrogatory as irrelevant because it requests information that has no bearing on the claims or defenses asserted in this action. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive to this interrogatory will be withheld pursuant to these privileges.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys was aware of Defendants' infringement at least as early as August 5, 2024, when Stratasys sent a letter regarding said infringement to Defendants. In further response to Defendants' infringement, Stratasys filed the present suit on August 8, 2024. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 9.**

Describe in complete detail all allegations by any person that any claim of any Asserted or Related Patent is invalid or unenforceable and Your response thereto.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys

therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail all allegations by any person that any claim . . . is invalid or unenforceable and Your response thereto” and includes “Related Patent[s]” and unasserted claims. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to this interrogatory to the extent it is not limited in time. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys refers Defendants to:

- The prosecution histories of the Asserted Patents (SYSBL000000001–SSYSBL000002241);
- The *inter partes* review petitions filed by Defendants against the Asserted Patents, including to date:

- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00321 (P.T.A.B. Dec. 17, 2024);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00257 (P.T.A.B. Dec. 9, 2024);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00531 (P.T.A.B. Feb. 5, 2025);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00532 (P.T.A.B. Feb. 5, 2025);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00438 (P.T.A.B. Feb. 6, 2025);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, PTAB-IPR2025-00585 (P.T.A.B. Feb. 6, 2025);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.* PTAB-IPR2025-00354 (P.T.A.B. Dec. 23, 2024);
- *Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.* PTAB-IPR2025-00311 (P.T.A.B. Dec. 18, 2024); and

- Defendants' Invalidity and Ineligibility Contentions served on January 30, 2025.

Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 10.**

Identify, and describe in complete detail, all licenses to any Asserted Patent, Related Patent, or Related Technology (including the substance of those licenses), whether originally assigned to Plaintiff or any company acquired by Plaintiff.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to “describe in complete detail” for “all licenses” and includes licenses to “Related Patent[s]” and “Related Technolog[ies].” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis, including whether a license is “to . . . Related Technology.” The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory

will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys will supplement its response to this Interrogatory in due course as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 11.**

Describe in complete detail the substance and outcome of all license discussions (*e.g.*, the terms offered by each party, any discussions regarding terms, and the final terms) relating to any Asserted Patent, Related Patent, or Related Technology, whether or not a license agreement was executed.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail the substance and outcome of all license discussions . . . relating to any . . . Related Patent, or Related Technology." Stratasys further objects to this interrogatory as overbroad and unduly burdensome to the extent it seeks draft materials related to agreements where the final version of the agreement has been provided.

Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis, including whether a license is “to . . . Related Technology.” The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys also objects to this interrogatory as unduly burdensome and duplicative to the extent it seeks overlapping information as Defendants’ Interrogatory No. 10.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys will supplement its response to this Interrogatory in due course as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 12.**

Describe in complete detail all ownership and other financial interests (and the history thereof) in any Asserted Patent or this action.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail all ownership and other financial interests (and the history thereof)." Stratasys further objects to this interrogatory as seeking information irrelevant to any triable issue of fact in this case. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys, Inc. currently owns all substantial rights in the Asserted Patents. The '660 Patent was previously owned by and assigned to Arevo, Inc. The '698, '381, '464, '097, '324 and '466 Patents were previously owned by and assigned to MakerBot Industries, LLC. The application

leading to the '774 Patent was previously owned by and assigned to MakerBot Industries, LLC prior to the issuance of the '774 Patent. Pursuant to Fed. R. Civ. P. 33(d) Stratasys also refers Defendants to: SSYSBL000002563–SSYSBL000002576, SSYSBL000002652–SSYSBL000002654.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12:**

Stratasys maintains its objections to this interrogatory. Pursuant to Fed. R. Civ. P. 33(d), in addition to the documents identified above, Stratasys refers Defendants to: SSYSBL000000001–SSYSBL000002241, SSYSBL000014263–SSYSBL000014412, SSYSBL000015088–SSYSBL000015089.

**INTERROGATORY NO. 13.**

To the extent You seek a reasonable royalty in this action, describe in complete detail the factual and supporting evidence for such reasonable royalty, including all factors described by *Georgia-Pacific Corp. v. U.S. Plywood Corp.*, 318 F. Supp. 1116 (S.D.N.Y. 1970), and identify all testimony and by Bates number all documents You contend support such claims.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail the factual and supporting evidence

for such reasonable royalty . . . and identify all testimony and by Bates number all documents You contend support such claims.” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court’s claim construction order has issued. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court’s scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys will supplement its response to this Interrogatory in due course and in consultation with its damages expert.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 14.**

Describe in complete detail the factual and legal basis for Your contention that, for each Asserted Claim, no non-infringing alternatives are available.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Defendants bear the initial burden to identify available, non-infringing alternatives to the asserted claims of the Asserted Patents, and You have failed to do so. Stratasys therefore reserves the right to supplement or amend this response should Defendants meet their burden to identify available, non-infringing alternatives. Furthermore, investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail the factual and legal basis for Your contention that . . . no non-infringing alternatives are available." Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more

appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it requests information that requires expert opinion and analysis and comes at a time when discovery is still at its early stages and before the Court's claim construction order has issued. The requested information is within the purview of experts and Stratasys will provide that information under the schedule entered by the Court. Stratasys reserves the right to offer additional or different facts in connection with expert submissions to be provided in accordance with the Court's scheduling order and the rules relating to expert disclosures, and nothing herein limits the right and privilege of any expert who may give an opinion or testimony on behalf of Stratasys to offer an opinion not referenced in this response, or rely on any facts or circumstances in support of testimony to be offered pursuant to Federal Rule of Evidence 702 and 703 not referenced in this response. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys further objects to this interrogatory to the extent it seeks a legal conclusion.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

In Defendants' January 22, 2025 responses to Stratasys's First Set of Interrogatories (Nos. 1-11), Defendants "identif[ied] the prior art cited during prosecution of the Asserted Patents, described in Bambu's . . . invalidity contentions, and that otherwise predates the Asserted Patents as non-infringing alternatives to the Asserted Patents." However, to the extent Defendants refer to prior art patents or publications, those patents and publications were not available alternatives that an infringer could buy from the marketplace. Furthermore, with respect to Defendants' Accused Products and any system art Defendants intended to identify as non-infringing alternatives, Defendants have failed to show that such systems are non-infringing. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 15.**

Describe in complete detail all Marking, and efforts to enforce Marking, of the number of any Asserted Patent on products sold by Plaintiff or Plaintiff's licensees.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as irrelevant and premature as Defendants have not set forth a prima facie case for a marking defense under 35 U.S.C. § 287. Defendants bear the initial burden of identifying products that allegedly do not comply with the marking requirements of 35 U.S.C. § 287, and they have failed to do so. Stratasys therefore reserves the right to supplement or amend this response should Defendants meet their burden to make marking an issue in the case. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail all Marking, and efforts to enforce Marking, of the number of any Asserted Patent on products sold by Plaintiff or Plaintiff's licensees." Stratasys further objects to

this interrogatory's use of "Marking" as overly broad and seeking a legal conclusion, as that term is defined to include "all actions undertaken to comply with 35 U.S.C. § 287." Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive to this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Stratasys maintains its objections to this Interrogatory. Should Defendants carry their burden to identifying products that allegedly do not comply with the marking requirements of 35 U.S.C. § 287, Stratasys will supplement its response to this Interrogatory in due course as appropriate.

**INTERROGATORY NO. 16.**

Describe in complete detail the factual and legal basis and supporting evidence for Your contention that You are entitled to a permanent injunction.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or

should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail the factual and legal basis and supporting evidence....” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it comes at a time when discovery is still at its early stages. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys further objects to this interrogatory to the extent it seeks a legal conclusion.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys is entitled to a permanent injunction against Defendants at least because Stratasys has suffered an irreparable injury by Defendants’ infringement; remedies available at law, such as monetary damages, are inadequate to compensate for that injury; on balance a remedy in equity is warranted; and the public interest would not be disserved by a permanent injunction. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 17.**

Describe in complete detail the factual and legal basis and supporting evidence for Plaintiff's contention that Defendants' alleged infringement is willful.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail the factual and legal basis and supporting evidence...." Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it comes at a time when discovery is still at its early stages. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects

to this interrogatory to the extent it calls for information not in its possession, custody or control. Stratasys further objects to this interrogatory to the extent it seeks a legal conclusion.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Defendants have had knowledge of the Asserted Patents and Defendants' infringement of the same since at least August 5, 2024, which is the date Stratasys sent Defendants a letter regarding Defendants' infringement of the Asserted Patents. In addition, Defendants have had knowledge of the Asserted Patents and knowledge of their infringing actions at least as of the August 8, 2024 filing date of the Complaints. Despite this knowledge, Defendants have continued to infringe the claims of the Asserted Patents. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate. Stratasys also notes that Defendants' document production is not yet complete and Stratasys reserves the right to supplement its response to these interrogatories based on information produced by Defendants during discovery, including Defendants' knowledge of Stratasys's printers as well as the Asserted Patents. Pursuant to Fed. R. Civ. P. 33(d), Stratasys also refers Defendants to: SSYSBL000002577–SSYSBL000002579.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 18.**

Describe in complete detail the factual and legal basis and supporting evidence for Plaintiff's request that the Court declare this case exceptional under 35 U.S.C. § 285, including but not limited to the basis relied upon for pleading exceptionality in Plaintiff's Complaint and identify by Bates number all documents in support of such claims.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail the factual and legal basis and supporting evidence . . . and identify by Bates number all documents in support of such claims.” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as premature because it comes at a time when discovery is still at its early stages. Stratasys objects to this interrogatory to the extent it seeks publicly available information; the burden of deriving or ascertaining such information is substantially the same for Defendants as for Stratasys. Stratasys objects to the extent this interrogatory calls for information protected by attorney-client privilege, the work product doctrine, common interest privilege, and/or other applicable privilege. Information or materials responsive this interrogatory will be withheld pursuant to these privileges. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Subject to the foregoing specific objections and General Objections, Stratasys answers as follows upon the best information and belief currently available to Stratasys after reasonable inquiry.

Stratasys incorporates-by-reference its response to Defendants' Interrogatory No. 17 in full. Defendants' actions, including the filing of a mirror-image suit in the Western District of Texas where venue is improper (*BambuLab USA, Inc., et al. v. Stratasys, Inc.*, Civil Action No. 1:24-cv-01511 (W.D. Tex. December 9, 2024)), support the finding of an exceptional case. Discovery is ongoing and Stratasys will supplement this interrogatory as appropriate.

Stratasys's investigation in this regard is ongoing, and Stratasys thus reserves the right to supplement or amend this response as additional information is discovered.

**INTERROGATORY NO. 19.**

Identify, and describe in complete detail, all instances of any Stratasys, Arevo, MakerBot, or UltiMaker employee or other individual acting on Stratasys's, Arevo's, MakerBot's, or UltiMaker's behalf that has contributed to, submitted code to, or otherwise participated in the development of any open-source software repository, including but not limited to contributions made to projects hosted on GitHub, GitLab, Bitbucket, or similar platforms. Your response should identify the employee, identify what code or repository they contributed to, identify what their contribution was, and identify by Bates number all documents You contend show each such contribution, specifying the specific contribution shown for each document.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe "in complete detail, all instances of any Stratasys, Arevo,

MakerBot, or UltiMaker employee or other individual acting on Stratasys's, Arevo's, MakerBot's, or UltiMaker's behalf that has contributed to, submitted code to, or otherwise participated in the development of any open-source software repository." Stratasys further objects to the extent the interrogatory requests that Stratasys identify each "employee, identify what code or repository they contributed to, identify what their contribution was, and identify by Bates number all documents You contend show each such contribution, specifying the specific contribution shown for each document." Stratasys further objects to this Interrogatory as compound. Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as seeking irrelevant information because the request has no bearing on the claims or defenses asserted in this action. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Stratasys maintains its objections to this Interrogatory and is willing to meet and confer with Defendants to properly limit the scope of this Interrogatory.

**INTERROGATORY NO. 20.**

For any employees identified in response to Interrogatory No. 19, identify their work and personal email addresses and account information for GitHub, GitLab, Bitbucket, and similar platforms through which they make contributions to any open-source code or repositories. Your response should identify those accounts or profiles for each employee with sufficient information to identify the employee and their contributions.

**RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to the interrogatory as overbroad and unduly burdensome to the extent that it purports to require Stratasys to, "[f]or

any employees identified in response to Interrogatory No. 19, identify their work and personal email addresses and account information for GitHub, GitLab, Bitbucket, and similar platforms through which they make contributions to any open-source code or repositories.” Stratasys also objects to this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as seeking irrelevant information because the request has no bearing on the claims or defenses asserted in this action. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Stratasys maintains its objections to this Interrogatory and is willing to meet and confer with Defendants to properly limit the scope of this Interrogatory.

#### **INTERROGATORY NO. 21.**

Identify and describe in complete detail any third-party software incorporated into any Stratasys, Arevo, MakerBot, or UltiMaker product or service, including but not limited to any such software subject to an open-source license.

#### **RESPONSE:**

Stratasys incorporates its General Objections above. Stratasys objects to this interrogatory as premature. Investigation and discovery are continuing, and information relevant to the subject of this interrogatory lies outside of the possession, custody, or control of Stratasys. Stratasys therefore reserves the right to supplement or amend this response as discovery progresses and/or should future investigation indicate that supplementation or amendment is necessary. Stratasys further objects to the interrogatory as vague, overbroad, and unduly burdensome to the extent that it purports to require Stratasys to describe “in complete detail any third-party software incorporated into any Stratasys, Arevo, MakerBot, or UltiMaker product or service.” Stratasys also objects to

this interrogatory as overly broad and unduly burdensome to the extent it requests a narrative description of information that is more appropriately obtained through other forms of discovery, such as deposition testimony and document production. Stratasys additionally objects to this interrogatory as seeking irrelevant information because the request has no bearing on the claims or defenses asserted in this action. Stratasys further objects to this interrogatory to the extent it calls for information not in its possession, custody or control.

Stratasys maintains its objections to this Interrogatory and is willing to meet and confer with Defendants to properly limit the scope of this Interrogatory.

Dated: April 22, 2025

Respectfully submitted,

By: /s/ Kevin J. Meek

Kevin J. Meek  
Texas State Bar No. 13899600  
Brian Oaks  
Texas State Bar No. 24007767  
Syed Fareed  
Texas State Bar No. 24065216  
Aashish Kapadia  
Texas State Bar No. 24097917  
Christian T. Tatum  
Texas State Bar No. 24125429  
**MCDERMOTT WILL & EMERY LLP**  
300 Colorado Street, Suite 2200  
Austin, Texas 78701-4078  
Telephone: (512) 726-2579  
Facsimile: (512) 532-0002  
*kmeek@mwe.com*  
*boaks@mwe.com*  
*sfareed@mwe.com*  
*akapadia@mwe.com*

Deron R. Dacus  
Texas Bar No. 00790553  
**THE DACUS FIRM, P.C.**  
821 ESE Loop 323, Suite 430  
Tyler, Texas 75701  
903-705-1117 (phone)  
903-705-1117 (fax)  
*ddacus@dacusfirm.com*

Andrea L. Fair  
Texas Bar No. 24078488  
Claire A. Henry  
Texas Bar No. 24053063  
**MILLER FAIR HENRY, PLLC**  
1507 Bill Owens Parkway  
Longview, Texas 75604  
Tel: (903) 757-6400  
Fax: (903) 757-2323  
*andrea@millerfairhenry.com*  
*claire@millerfairhenry.com*

Jason Kraus

**NELSON MULLINS RILEY &  
SCARBOROUGH LLP**

1600 Utica Ave. South Ste. 600

Minneapolis, MN 55416

Tel: 612-464-4500

jason.kraus@nelsonmullins.com

***ATTORNEYS FOR PLAINTIFF  
STRATASYS, INC.***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record on this 22nd day of April, 2025.

*/s/ Kevin J. Meek*

Kevin J. Meek