

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

W&WSENS DEVICES INC.,)	
)	
Plaintiff,)	Case No. 2:24-cv-00854-JRG
)	
v.)	
)	
SAMSUNG ELECTRONICS CO., LTD,)	
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR, INC.,)	
and SAMSUNG AUSTIN SEMICONDUCTOR)	
LLC,)	
)	
Defendants.)	
)	

**PLAINTIFF W&WSENS DEVICES INC.’S OBJECTIONS AND
RESPONSES TO DEFENDANTS’ FIRST SET OF INTERROGATORIES (NOS. 1-11)**

Pursuant to Fed. R. Civ. P. Rules 26 and 33, Plaintiff W&Wsens Devices Inc. (“W&Wsens,” “W&W,” or “Plaintiff”), responds to Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor LLC (together, “Samsung” or “Defendants”) First Set of Interrogatories. W&Wsens makes these objections and responses herein (collectively “Responses”) based solely on its current knowledge, understanding, and belief as to the facts and information reasonably available to it as of the date of the Responses.

Additional discovery and investigation may lead to additions to, changes in, or modifications of these Responses. The Responses, therefore, are given without prejudice to W&Wsens’ right to supplement these Responses pursuant to Fed. R. Civ. P. 26(e), or to provide subsequent discovered information and to introduce such subsequently discovered information at the time of any trial or proceeding in this action.

photodetectors to test their inventions and collaborate on design improvement. Dr. Islam conducted a series of proof of concept fabrication runs, verifying the efficacy of the use of microstructures and fabricating and testing the resulting photodetectors. Along with Shih-Yuan Wang and Shih-Ping Wang, Dr. Islam contributed to the conception of claims of the '700 and '543 Patents.

The following individuals have information regarding the subject matter of this Interrogatory: Shih-Yuan Wang, Shih-Ping Wang, and M. Saif Islam.

Subject to its objections and pursuant to Federal Rule of Civil Procedure 33(d), W&Wsens further refers Defendants to the following range of Bates-labeled documents: WWSSENS000001-000127, WWSSENS000128-001264, WWSSENS001265-001464, WWSSENS001465-002367, WWSSENS002368-002567, WWSSENS002568-003205, WWSSENS003206-003284, WWSSENS003285-003800, WWSSENS003801-003880, WWSSENS003881-004534, WWSSENS004569-004601, WWSSENS007498-007747.

W&Wsens' investigation of this matter is ongoing, and its response to this Interrogatory will be supplemented as additional information becomes known to it.

INTERROGATORY NO. 2

Completely describe the creation and operation of W&W, including all assets of W&W, the reason for the creation of W&W, all prior and current actual and beneficial owners, investors, or employees of W&W, the circumstances of how W&W acquired rights in the Asserted Patents, including dates and persons involved in such acquisition, and identify all documents relating to the creation, operation, and investments of W&W.

RESPONSE TO INTERROGATORY NO. 2

W&Wsens incorporates its General Objections and Objections to Definitions and Instructions by reference. W&Wsens objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, the work product doctrine, the common interest doctrine, or any other applicable law, privilege, doctrine, or immunity. W&Wsens will not disclose any privileged information. W&Wsens further objects to this Interrogatory to the extent it calls for a legal conclusion. W&Wsens objects to this Interrogatory to the extent it is vague and ambiguous. W&Wsens objects to this Interrogatory as being compound and having multiple subparts and as seeking discovery into multiple issues including (1) the creation of W&Wsens, (2) the operation of W&Wsens, (3) the assets of W&Wsens, (4) the purpose of W&Wsens, (5) the ownership of W&Wsens, (6) the investors in W&Wsens, (7) the employees of W&Wsens, and (8) W&Wsens' acquisition of the Asserted Patents, each of which represents a distinct interrogatory. W&Wsens objects to this Interrogatory as seeking information that is irrelevant, immaterial, or not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing General Objections and any specific objections contained herein, W&Wsens responds as follows:

Shih-Yuan Wang and Shih-Ping Wang formed W&Wsens in November 2014 as a company to develop their inventions. W&Wsens developed and tested the inventions of the Asserted Patents, including by contracting with Dr. Islam to fabricate proof of concept and test photodetectors. In addition, in late 2024, W&Wsens engaged Katya Ponizovskaya Devine, who conducted computer simulations confirming the efficacy of the inventors' inventions.

Dated: March 20, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certify that, on March 20, 2025, a true and correct copy of the foregoing **PLAINTIFF W&WSENS DEVICES INC.’S OBJECTIONS AND RESPONSES TO DEFENDANTS’ FIRST SET OF INTERROGATORIES (NOS. 1-11)** was served via electronic mail upon counsel of record for Defendants as indicated:

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