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**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.	)	<b>CONFIDENTIAL</b>
	)	
SAMSUNG ELECTRONICS CO., LTD,	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC., SAMSUNG SEMICONDUCTOR, INC.,	)	
and SAMSUNG AUSTIN SEMICONDUCTOR	)	
LLC,	)	
	)	
Defendants.	)	
	)	

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**PLAINTIFF W&WSENS DEVICES INC.’S  
FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES  
TO DEFENDANTS’ FIRST SET OF INTERROGATORIES (NOS. 1 AND 3)**

Pursuant to Fed. R. Civ. P. Rules 26 and 33, Plaintiff W&Wsens Devices Inc. (“W&Wsens,” “W&W,” or “Plaintiff”), provides these First Supplemental Objections and Responses 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.

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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.

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

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 objects to this Interrogatory as overbroad and unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and neither relevant nor proportional to the needs of this case. W&Wsens

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objects to this Interrogatory as being compound and having multiple subparts and as seeking discovery into multiple issues including (1) conception, (2) diligence, (3) reduction to practice, and (4) earliest effective filing date, each of which represents a distinct interrogatory. W&Wsens objects to this Interrogatory as seeking information that is covered by confidential agreements with third-parties or protective orders of other litigations or any other proceedings.

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

The following table sets forth the conception date, reduction to practice date, and earliest effective filing date for the asserted claims of the Asserted Patents:

<b>Patent</b>	<b>Asserted Claims</b>	<b>Conception Date</b>	<b>Reduction to Practice Date</b>	<b>Earliest Effective Filing Date</b>
U.S. 9,525,084	1, 2, 3, 5, 7, 8, 11, 12, 13, 14, 15, 17, 18, 19, 21	November 2014	November 18, 2014 (constructive)	November 18, 2014
U.S. 10,446,700	1, 3, 7, 9, 10, 16, 20, 24, 26, 28, 29, 30, 32	April 2013	May 22, 2013 (constructive)	May 22, 2013
U.S. 10,468,543	1, 3, 7, 9, 10, 16, 20, 24, 26, 28, 29, 30, 32	April 2013	May 22, 2013 (constructive)	May 22, 2013
U.S. 11,621,360	1, 3, 5, 6, 8, 9	April 2013	May 22, 2013 (constructive)	May 22, 2013
U.S. 12,087,871	1, 2, 3, 4, 6, 7, 8, 10, 12, 14, 15, 16, 17, 18	April 2013	May 22, 2013 (constructive)	May 22, 2013

Shih-Yuan Wang and Shih-Ping Wang conceived of the inventions of the asserted claims of the '700, '543, '360 and '871 Patents in or around April 2013. At that time, Shih-Yuan Wang and Shih-Ping Wang were working on solutions to improve the absorption efficiency of thin silicon, such as for use in optical interconnect and CMOS-type applications. They conceived of the solution of using microstructures in thin silicon to increase absorption sensitivity during this

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time period and then worked diligently with their patent counsel to prepare a patent application. They filed Provisional Application U.S. 61/826,446 shortly thereafter on May 22, 2013, which was a constructive reduction to practice of their inventions.

In or around June 2014, Shih-Yuan Wang and Shih-Ping Wang engaged Dr. M. Saif Islam, a professor at the University of California, Davis, to fabricate proof of concept 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. 3**

Identify and describe with specificity all attempts, whether successful or not, by or on behalf of W&W, W&W investor(s), or any previous owner of any of the Asserted Patents, to

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**CERTIFICATE OF SERVICE**

The undersigned hereby certify that, on April 3, 2025, a true and correct copy of the foregoing **PLAINTIFF W&WSENS DEVICES INC.'S FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANTS' FIRST SET OF INTERROGATORIES (NOS. 1 AND 3)** was served via electronic mail upon counsel of record for Defendants as indicated:

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