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11 *University of British Columbia*

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 UNIVERSITY OF BRITISH COLUMBIA,

16 Plaintiff/Counterclaim-  
17 Defendant,

18 v.

19 CAPTION HEALTH, INC.; GE  
20 HEALTHCARE TECHNOLOGIES INC.,

21 Defendant/Counterclaim-  
22 Plaintiff.

Case No. 5:24-cv-03200-EKL

23 UBC'S OBJECTIONS AND RESPONSES  
24 TO DEFENDANTS' SECOND SET OF  
25 REQUESTS FOR PRODUCTION OF  
26 DOCUMENTS AND THINGS (NOS. 64-113)

23 University of British Columbia ("UBC" or "Plaintiff") hereby provides its objections and  
24 responses to Caption Health Inc. and GE Healthcare Technologies, Inc.'s ("Defendants") Second  
25 Set of Requests for Production of Documents and Things to Plaintiff (Nos. 64-113, "Requests"),  
26 served on March 20, 2025.

27 Plaintiff reserves all rights to supplement, revise, and/or amend these responses should

1 additional information become available through the discovery process or by other means. Plaintiff  
2 also reserves the right to produce or use any information or documents that are discovered after  
3 service of these responses in support of or in opposition to any motion, in depositions, or at hearings  
4 or trial. In responding to Defendants' Second Set of Requests for Production, Plaintiff does not  
5 waive any objection on the grounds of privilege, confidentiality, competency, relevance,  
6 materiality, authenticity, admissibility of the information contained in these responses, or any other  
7 objection.

### 8 GENERAL OBJECTIONS

9 1. Plaintiff objects to each of the Requests and related definitions and instructions to  
10 the extent that they purport to impose obligations beyond those required by the Federal Rules of  
11 Civil Procedure, the Local Rules of the Northern District of California, or orders of the Court.

12 2. Plaintiff objects to the extent the Requests seek documents protected by the attorney-  
13 client privilege, work product immunity, or any other evidentiary privilege or immunity.

14 3. Plaintiff objects to each of the Requests to the extent it calls for production of any  
15 documents or things that are not relevant to the issues pending in this case or that are not  
16 discoverable under Federal Rule of Civil Procedure 26.

17 4. Plaintiff objects to Requests for the production of "all" documents or things as  
18 potentially overly broad and unduly burdensome because in many cases Plaintiff cannot be sure  
19 that "all" documents or things have been identified. Where indicated, Plaintiff will conduct a  
20 reasonable search for the requested documents and things and will produce responsive documents  
21 and things located as a result of such search, subject to Plaintiff's objections.

22 5. Plaintiff objects to each of the Requests to the extent it seeks information outside of  
23 Plaintiff's possession, custody, or control, or calls for Plaintiff to prepare documents and/or things  
24 that do not already exist.

25 6. Plaintiff objects to each of the Requests to the extent it calls for the production of  
26 electronically-stored documents or things that are not readily accessible, on the ground that they  
27 are not relevant or "proportional to the needs of the case, considering the importance of the issues

1 at stake in the action, the amount in controversy, the parties' relative access to relevant information,  
2 the parties' resources, the importance of the discovery in resolving the issues, and whether the  
3 burden or expense of the proposed discovery outweighs its likely benefit." Fed. R. Civ. P. 26(b)(1).

4 7. Plaintiff objects to each of the Requests as premature to the extent it purports to seek  
5 email communications outside of the procedures set forth in the Stipulated E-Discovery Order (Dkt.  
6 No. 42. Plaintiff will await Defendants' initiation of the procedures relating to email discovery  
7 where documents responsive to Requests would most likely exist in email.

8 8. Plaintiff objects to Defendants' definition of "You," "your," or "Plaintiff," as overly  
9 broad and disproportionate to the needs of the case, particularly to the extent it includes entities for  
10 which Plaintiff has no custody or control of the entities' documents, including but not limited to  
11 "any person who served in any such capacity at any time during the relevant time period specified  
12 herein." In responding to these Requests, Plaintiff will construe "You," "Your," or "Plaintiff" to  
13 mean UBC.

14 9. Plaintiff reserves and does not waive objections to any definitions or terms that are  
15 not used in specific Requests.

16 10. These General Objections are incorporated into each of the following responses and  
17 shall be deemed continuing as to each Request and are not waived, or in any way limited, by  
18 Plaintiff's specific responses and objections.

19 11. UBC objects to Definition No. 3 as overly broad and potentially unduly burdensome.

20 **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION OF**  
21 **DOCUMENTS**

22 **REQUEST FOR PRODUCTION NO. 64:**

23 All Documents identified by, referenced in, or used to prepare the Amended Complaint.

24 **RESPONSE:**

25 UBC objects to the Request as overly broad and as seeking documents protected by the  
26 attorney-client privilege and work-product immunity. Without waiving these objections, to the  
27 extent documents are "identified" or "referenced in" the Amended Complaint, they either have been  
28 produced (e.g., patents-in-suit) or will be produced. The reference to documents "used to prepare"

1 the Amended Complaint, is overly vague. Without waiving that objection, to the extent that UBC  
2 relied on any documents describing the accused products for purposes of the Amended Complaint,  
3 they are identified in UBC's infringement contentions and are either in Defendants' possession or  
4 have been produced.

5 **REQUEST FOR PRODUCTION NO. 65:**

6 All Documents supporting or refuting Count II – Infringement of U.S. Patent No.  
7 10,751,029 of the Amended Complaint including without limitation, each Document supporting  
8 the assertion of direct or indirect infringement of one or more claims of the '029 Patent.

9 **RESPONSE:**

10 UBC objects to the Request as overly broad and unduly vague. Further, UBC has already  
11 produced most or all of the responsive documents in its possession, including its infringement  
12 contentions and the documents identified in the contentions. The only documents that purportedly  
13 “refute” the infringement allegations are those that Defendants have filed or served in the litigation.  
14 UBC also objects to the extent this Request seeks documents that are already in Defendants'  
15 possession, and that UBC has requested in connection with its own discovery requests.

16 **REQUEST FOR PRODUCTION NO. 66:**

17 All Documents supporting or refuting the allegations of paragraph 43 of the  
18 Amended Complaint, including without limitation, those that support the statement, “[t]his design  
19 reduced the processing time and resources that would typically be required for performing two  
20 assessments.”

21 **RESPONSE:**

22 UBC objects to the Request as overly broad and at least potentially unduly burdensome.  
23 Without waiving this objection or the general objections above, UBC will produce responsive  
24 documents to the extent they exist and can be identified through a reasonable search.

25 **REQUEST FOR PRODUCTION NO. 67:**

26 Documents sufficient to identify the role and contribution of each Person that was involved  
27 in the development of the technology claimed in the '029 Patent.

1 **RESPONSE:**

2 UBC does not believe that it has documents that are “sufficient to identify the role and  
3 contribution of each Person” involved in the development of the technology claimed in the ’029  
4 patent. Many of those contributions simply are not reflected in any documents. Without waiving  
5 these objections or the general objections above, UBC has already produced documents reflecting  
6 on the development work on the technology. To the extent it can identify any additional responsive  
7 documents through a reasonable search, they will be produced.

8 **REQUEST FOR PRODUCTION NO. 68:**

9 Documents sufficient to identify each unpublished patent application claiming priority to  
10 Canadian patent application number CA2019/051192.

11 **RESPONSE:**

12 There are no responsive documents.

13 **REQUEST FOR PRODUCTION NO. 69:**

14 Documents sufficient to identify each unpublished patent application claiming priority to  
15 U.S. patent application number US 16/557,261.

16 **RESPONSE:**

17 There are no responsive documents.

18 **REQUEST FOR PRODUCTION NO. 70:**

19 Documents sufficient to identify each unpublished patent application claiming priority to  
20 U.S. provisional patent application number 62/725,913.

21 **RESPONSE:**

22 There are no responsive documents.

23 **REQUEST FOR PRODUCTION NO. 71:**

24 Documents sufficient to identify all attorneys and firms who represented Plaintiff  
25 concerning prosecution of the ’029 Patent.

26 **RESPONSE:**

27 UBC objects to the Request to the extent it seeks documents protected by the attorney-client  
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1 privilege. Without waiving this objection or the general objections above, UBC does not believe it  
2 has non-privileged documents sufficient to identify all attorneys and firms who represent Plaintiff  
3 “concerning prosecution of the ’029 Patent,” but the attorneys substantively involved are identified  
4 in the file history of the ’029 patent application, which has already been produced.

5 **REQUEST FOR PRODUCTION NO. 72:**

6 Communications and Documents sufficient to identify each patentability opinion  
7 concerning the technology claimed in the ’029 Patent.

8 **RESPONSE:**

9 UBC objects to the Request as unduly vague as to what is a “patentability opinion.” UBC  
10 further objects to the extent the Request seeks documents protected by the attorney-client privilege  
11 or work-product immunity. The only non-privileged documents UBC can identify are those  
12 associated with the file history of the ’029 patent, including the Notice of Allowance.

13 **REQUEST FOR PRODUCTION NO. 73:**

14 All Documents used to prepare the claim charts attached to Plaintiff’s Second Supplemental  
15 Preliminary Infringement Contentions served on February 7, 2025.

16 **RESPONSE:**

17 UBC objects to the Request as overly broad and as seeking documents protected by the  
18 attorney-client privilege and work-product immunity. Without waiving these objections, to the  
19 extent documents are identified in the infringement contentions, they either have been produced  
20 (e.g., patents-in-suit) or will be produced. The reference to documents “used to prepare” the  
21 contentions is overly vague.

22 **REQUEST FOR PRODUCTION NO. 74:**

23 All Documents concerning the value of the technology claimed in the ’029 Patent, including  
24 appraisals and valuations.

25 **RESPONSE:**

26 UBC objects to the Request as unduly vague or overly broad insofar as it seeks all  
27 documents “concerning the value of the technology claimed in the ’029 Patent.” Responsive  
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1 documents include the patent application and file history, and documents that Defendants have  
2 produced in this litigation. Without waiving these objections or the general objections above, no  
3 formal “appraisals” or “valuations” of the value of the technology have been performed.

4 **REQUEST FOR PRODUCTION NO. 75:**

5 Documents sufficient to show the costs of researching and developing the technology  
6 claimed in the '029 Patent.

7 **RESPONSE:**

8 UBC has already produced responsive documents reflecting some of the costs of  
9 researching and developing the technology and does not believe there are any other responsive  
10 documents.

11 **REQUEST FOR PRODUCTION NO. 76:**

12 All contracts concerning the '029 Patent or the technology claimed in the '029 Patent,  
13 including assignments and licenses.

14 **RESPONSE:**

15 UBC has already produced responsive documents, including any assignments and licenses.  
16 To the extent any additional responsive documents can be identified through a reasonable search,  
17 they will be produced.

18 **REQUEST FOR PRODUCTION NO. 77:**

19 All Documents concerning products or methods that UBC contends practice and/or embody  
20 one or more claims of the '029 Patent.

21 **RESPONSE:**

22 UBC objects to the Request as overly broad, unduly vague, and unduly burdensome. UBC  
23 also objects to the extent the Request purports to require UBC to conduct infringement analyses  
24 with respect to products not at issue in this litigation. UBC further objects that most or all responsive  
25 documents are in the possession of Defendants. Without waiving these objections, UBC will  
26 produce any documents concerning Defendants' infringing methods or products to the extent they  
27 are in UBC's possession, have not been previously produced, and can be identified through a

1 reasonable search.

2 **REQUEST FOR PRODUCTION NO. 78:**

3 All Documents concerning, and physical samples of, Prior Art to one or more claims of the  
4 '029 Patent.

5 **RESPONSE:**

6 UBC objects to the Request as overly broad and unduly burdensome, particularly given the  
7 definition of "Prior Art." The Request appears to literally encompass all activities that occurred  
8 prior to the effective filing date of the '029 patent application. Without waiving these objections or  
9 the general objections above, the most pertinent prior art to UBC's knowledge is the prior art that  
10 has already been identified in the litigation, including prior art cited in the file histories of the '591  
11 and '029 patents.

12 **REQUEST FOR PRODUCTION NO. 79:**

13 Documents concerning a long felt but unmet need for the inventions claimed in the '029  
14 Patent.

15 **RESPONSE:**

16 To the extent responsive documents exist in UBC's possession, and can be identified  
17 through a reasonable search, they will be produced.

18 **REQUEST FOR PRODUCTION NO. 80:**

19 Documents concerning commercial success of the inventions claimed in the '029 Patent.

20 **RESPONSE:**

21 UBC objects that documents responsive to this Request are primarily in Defendants'  
22 possession. Without waiving this objection and the general objections above, UBC believes it has  
23 produced all responsive documents in its possession, including documents relating to Caption  
24 Health and Intelligent Ultrasound, and the success of the Caption Guidance and Voluson products.  
25 UBC has also requested that Defendants produce such documents.

26 **REQUEST FOR PRODUCTION NO. 81:**

27 All Documents and things upon which Plaintiff intends to rely to establish the level of  
28

1 ordinary skill in the art concerning the inventions claimed in the '029 Patent.

2 **RESPONSE:**

3 UBC objects to the Request as premature because, in part, UBC has not taken a position on  
4 the level of ordinary skill in the art at this point. Without waiving this objection and the general  
5 objections above, UBC has not yet identified the documents it will rely on to establish the ordinary  
6 skill in the art for the '029 inventions.

7 **REQUEST FOR PRODUCTION NO. 82:**

8 All Documents indicating that the inventions claimed in the '029 Patent were not obvious  
9 to a person having ordinary skill in the art at the time the application for the '029 Patent was filed.

10 **RESPONSE:**

11 UBC objects to the Request as overly vague and unduly broad and as potentially seeking a  
12 legal conclusion. Without waiving this objection and the general objections above, the file history  
13 of the patent is responsive to the Request. UBC is not currently aware of other responsive  
14 documents but to the extent it identifies any, they will be produced.

15 **REQUEST FOR PRODUCTION NO. 83:**

16 All reports, analyses, and comparisons of Prior Art to any inventions claimed in the '029  
17 Patent.

18 **RESPONSE:**

19 UBC objects to the Request to the extent it seeks documents protected by the attorney-client  
20 privilege or work-product immunity. UBC further objects to the extent the Request seeks  
21 documents that Defendants have generated in this litigation, including its allegations of invalidity.  
22 Without waiving this objection and general objections above, UBC is unaware of any additional  
23 non-privileged responsive documents.

24 **REQUEST FOR PRODUCTION NO. 84:**

25 All Documents containing an assertion that any third party has, or has not, infringed one or  
26 more claims of the '029 Patent.

27 **RESPONSE:**

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1 UBC objects to the Request to the extent it seeks documents protected by the attorney-client  
2 privilege. Without waiving this objection or the general objections above, UBC is unaware of any  
3 responsive nonprivileged documents.

4 **REQUEST FOR PRODUCTION NO. 85:**

5 All Documents containing any third-party assertion that one or more claims of the '029  
6 Patent are invalid.

7 **RESPONSE:**

8 UBC is unaware of any responsive documents.

9 **REQUEST FOR PRODUCTION NO. 86:**

10 All Documents containing any third-party assertion that one or more claims of the '029  
11 Patent are unenforceable.

12 **RESPONSE:**

13 UBC is unaware of any responsive documents.

14 **REQUEST FOR PRODUCTION NO. 87:**

15 All Documents concerning any legal proceeding other than this Litigation in any forum  
16 concerning the '029 Patent, including without limitation, any petition or proceeding before the  
17 Patent Trial and Appeal Board.

18 **RESPONSE:**

19 UBC is unaware of any responsive documents.

20 **REQUEST FOR PRODUCTION NO. 88:**

21 The 2020 Master Project Agreement for Canada's Digital Technology Supercluster Project,  
22 as referenced in UBC's response to Defendants' Interrogatory No. 1.

23 **RESPONSE:**

24 The document will be produced.

25 **REQUEST FOR PRODUCTION NO. 89:**

26 All documents and communications concerning Plaintiff's efforts to monetize,  
27 commercialize, transfer, or derive value from either or both of the Patents in Suit or the technology

1 claimed in either or both of the Patents in Suit.

2 **RESPONSE:**

3 UBC objects to the Request to the extent it encompasses documents protected by the  
4 attorney-client privilege or work product immunity. Without waiving this objection and the general  
5 objections above, UBC will produce responsive nonprivileged documents to the extent they exist  
6 in its possession and can be identified through a reasonable search.

7 **REQUEST FOR PRODUCTION NO. 90:**

8 All communications to any party concerning an agreement including an option to license  
9 the Patents in Suit, collectively or individually.

10 **RESPONSE:**

11 UBC objects to “option to license” as unduly vague but to the extent the Request seeks  
12 documents relating to licensing, UBC will produce responsive documents to the extent they exist  
13 in its possession and can be identified through a reasonable search.

14 **REQUEST FOR PRODUCTION NO. 91:**

15 Documents sufficient to identify the refusal, lapse, or other failure of a party to exercise an  
16 option to license the Patents in Suit, collectively or individually.

17 **RESPONSE:**

18 UBC objects to “option to license” as unduly vague but to the extent the Request seeks  
19 documents relating to licensing, UBC will produce responsive documents to the extent they exist  
20 in its possession and can be identified through a reasonable search.

21 **REQUEST FOR PRODUCTION NO. 92:**

22 Documents sufficient to identify any incentive, bonus, or extra compensation that UBC  
23 offered to the named Inventors of the Patents in Suit to develop or commercialize the technology  
24 claimed in the Patents in Suit.

25 **RESPONSE:**

26 UBC has already produced responsive documents and does not believe there are any other  
27 responsive documents.

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1 **REQUEST FOR PRODUCTION NO. 93:**

2 Documents sufficient to show the role, mission, goals, and objectives of UBC's University-  
3 Industry Liaison Office as it relates to monetizing, commercializing, transferring, or deriving value  
4 from intellectual property, including but not limited to, policies, plans, projections, and reports.

5 **RESPONSE:**

6 UBC objects to the Request as potentially overly broad, and as seeking documents protected  
7 by the attorney-client privilege and/or work-product immunity. Without waiving these objections,  
8 UBC has produced the Inventions Policy for the Office, which it believes to be the only responsive  
9 non-privileged documents.

10 **REQUEST FOR PRODUCTION NO. 94:**

11 All licensing agreements in which Plaintiff is a licensor and the licensed product or service  
12 constitutes or includes software.

13 **RESPONSE:**

14 UBC objects to the Request as overly broad and unduly vague. UBC has already produced  
15 all patent license agreements related to ultrasound or artificial intelligence. To the extent  
16 Defendants want to add another category narrower than "software," UBC is willing to consider  
17 such an extension.

18 **REQUEST FOR PRODUCTION NO. 95:**

19 All documents and communications concerning the calculation or payment of royalties or  
20 other compensation under any licensing agreement to which Plaintiff is a party and the subject-  
21 matter claimed in said agreement is software or software-related.

22 **RESPONSE:**

23 UBC objects to the Request as overly broad, unduly vague and as seeking irrelevant  
24 documents. UBC has already produced all patent license agreements related to ultrasound or  
25 artificial intelligence.

26 **REQUEST FOR PRODUCTION NO. 96:**

27 All employment agreements signed by the named inventors of the Patents in Suit.

1 **RESPONSE:**

2 Responsive documents will be produced.

3 **REQUEST FOR PRODUCTION NO. 97:**

4 All invention assignment agreements signed by the named inventors of the Patents in Suit  
5 transferring an interest in one or both Patents in Suit.

6 **RESPONSE:**

7 The only responsive documents are part of the file histories and have been produced.

8 **REQUEST FOR PRODUCTION NO. 98:**

9 All confidentiality or non-disclosure agreements signed by any individual who materially  
10 contributed to the development of the technology claimed in the Patents in Suit, including the listed  
11 inventors of the Patent in Suit, concerning the development of this technology.

12 **RESPONSE:**

13 UBC objects to the Request as overly broad to the extent it seeks documents unrelated to  
14 the issues in the lawsuit. Without waiving this objection or the general objections above, there are  
15 no responsive documents.

16 **REQUEST FOR PRODUCTION NO. 99:**

17 Documents sufficient to identify all monetary or pecuniary interests of Purang  
18 Abolmaesumi, Robert Rohling, Teresa Tsang, Zhibin Liao, and Amir Abdi in the outcome of the  
19 Litigation.

20 **RESPONSE:**

21 Responsive documents have been produced.

22 **REQUEST FOR PRODUCTION NO. 100:**

23 Documents sufficient to show the impact of the invalidation of a patent obtained by an  
24 inventor on behalf of Plaintiff on any monetary, employment, or other incentive offered to such an  
25 individual.

26 **RESPONSE:**

27 UBC objects to the Request as confusing. The only adverse impact of an invalidation of a  
28

1 patent is presumably the loss of the opportunity to benefit from the licensing of the patent. With  
2 this understanding, UBC does not believe it has any responsive documents.

3 **REQUEST FOR PRODUCTION NO. 101:**

4 All documents sufficient to identify any studies performed on the clinical and diagnostic  
5 effectiveness of the technology claimed in the Patents in Suit.

6 **RESPONSE:**

7 UBC has already produced responsive documents. To the extent other responsive  
8 documents exist in UBC's possession (other than those that have been generated by Defendants),  
9 and can be identified through a reasonable search, they will be produced.

10 **REQUEST FOR PRODUCTION NO. 102:**

11 All documents concerning the clinical or diagnostic effectiveness of the technology claimed  
12 in the Patents in Suit over existing alternatives.

13 **RESPONSE:**

14 To the extent responsive documents exist in UBC's possession (other than the file history  
15 and those that have been generated by Defendants), and can be identified through a reasonable  
16 search, they will be produced.

17 **REQUEST FOR PRODUCTION NO. 103:**

18 All communication between Plaintiff and the inventors of the Patents in Suit, on one hand,  
19 and any clinical professional, on the other, concerning existing alternatives to the claimed  
20 technology.

21 **RESPONSE:**

22 UBC objects to the Request as unduly vague as to the meaning of "existing alternatives."  
23 Without waiving this objection or the general objections, UBC will produce nonprivileged  
24 documents to the extent they exist in its possession and can be identified through a reasonable  
25 search.

26 **REQUEST FOR PRODUCTION NO. 104:**

27 All communication between Plaintiff and the inventors of the Patents in Suit, on one hand,  
28

1 and any clinical professional, on the other, concerning the clinical and diagnostic challenges  
2 purported to be solved by the technology claimed in the Patents in Suit.

3 **RESPONSE:**

4 UBC objects to the Request as overly vague as to the meaning of “diagnostic challenges.”  
5 Without waiving this objection or the general objections, UBC will produce privileged documents  
6 to the extent they exist in its possession and can be identified through a reasonable search.

7 **REQUEST FOR PRODUCTION NO. 105:**

8 Documents sufficient to identify all collaborator feedback (including that from Clinical  
9 Professionals), surveys, or reports considering the performance, reception, or market demand for  
10 the technology claimed by the Patents in Suit as implemented or tested by Plaintiff.

11 **RESPONSE:**

12 UBC objects to the Request as overly broad or vague as to the meaning of “reports.” Without  
13 waiving this objection or the general objections, UBC will produce responsive documents to the  
14 extent they exist in its possession and can be identified through a reasonable search.

15 **REQUEST FOR PRODUCTION NO. 106:**

16 Documents sufficient to identify all early stage (alpha or beta) testing, prototypes, user  
17 trials, or pilot programs conducted to evaluate the performance usability of the technology claimed  
18 in the Patents in Suit.

19 **RESPONSE:**

20 Responsive, non-privileged documents will be produced to the extent they exist in UBC’s  
21 possession and can be identified through a reasonable search.

22 **REQUEST FOR PRODUCTION NO. 107:**

23 Documents sufficient to identify all strength and weakness analyses for the technology  
24 claimed in the Patents in Suit.

25 **RESPONSE:**

26 UBC objects to the Request as unduly vague. Without waiving this objection or the general  
27 objections, responsive, non-privileged documents, to the extent not already produced, will be

1 produced to the extent they exist in UBC's possession and can be identified through a reasonable  
2 search.

3 **REQUEST FOR PRODUCTION NO. 108:**

4 All documents concerning investment in the development of the technology claimed in the  
5 Patents in Suit, including grants and other funding received for the development of said technology.

6 **RESPONSE:**

7 UBC has already produced responsive documents. To the extent other responsive, non-  
8 privileged documents exist in UBC's possession and can be identified through a reasonable search,  
9 they will be produced.

10 **REQUEST FOR PRODUCTION NO. 109:**

11 All internal communication, including that between Plaintiff and the inventors of the Patents  
12 in Suit, concerning investment in the development of the technology claimed in the Patents in Suit,  
13 including grants and other funding received for the development of said technology.

14 **RESPONSE:**

15 UBC objects to the Request to the extent it seeks documents protected by the attorney-client  
16 privilege. Without waiving this objection and the general objections above, responsive, non-  
17 privileged documents will be produced to the extent they exist in UBC's possession and can be  
18 identified through a reasonable search.

19 **REQUEST FOR PRODUCTION NO. 110:**

20 All communication between Plaintiff or the inventors of the Patents in Suit, on one hand,  
21 and a third party, on the other, concerning investment in the development of the technology claimed  
22 in the Patents in Suit, including grants and other funding received for the development of said  
23 technology.

24 **RESPONSE:**

25 Responsive, non-privileged documents will be produced to the extent they exist in UBC's  
26 possession and can be identified through a reasonable search.

27 **REQUEST FOR PRODUCTION NO. 111:**

1 All documents concerning regulatory filings and approvals or other compliance efforts  
2 related to the technology claimed in the Patents in Suit.

3 **RESPONSE:**

4 UBC objects to the Request to the extent it seeks documents protected by the attorney-client  
5 privilege. Without waiving this objection and the general objections above, responsive, non-  
6 privileged documents will be produced to the extent they exist in UBC's possession and can be  
7 identified through a reasonable search.

8 **REQUEST FOR PRODUCTION NO. 112:**

9 All communications with regulatory bodies concerning regulatory filings and approvals or  
10 other compliance efforts related to the technology claimed in the Patents in Suit.

11 **RESPONSE:**

12 UBC is unaware of any responsive documents.

13 **REQUEST FOR PRODUCTION NO. 113:**

14 All Documents concerning internal and external audit reports, compliance reviews, and  
15 assessments related to the technology claimed in the Patents in Suit.

16 **RESPONSE:**

17 UBC does not believe it has any responsive nonprivileged documents.  
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1 Dated: April 21, 2025

**PERKINS COIE LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2005, a true and correct copy of the foregoing document was transmitted via electronic mail addressed to:

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