

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

PERCEPTIVE AUTOMATA LLC,

Plaintiff,

v.

TESLA, INC.,

Defendant.

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Case No. 2:25-cv-00742-JRG

JURY TRIAL DEMANDED

**DEFENDANT TESLA, INC.’S FIRST SET OF INTERROGATORIES TO PLAINTIFF
PERCEPTIVE AUTOMATA LLC (NOS. 1-7)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Tesla, Inc. (“Defendant” or “Tesla”), hereby requests that Plaintiff Perceptive Automata LLC (“Plaintiff” or “Perceptive”), respond to the following interrogatories separately, fully, and under oath within thirty (30) days of service. These interrogatories impose a continuing duty upon Plaintiff to supplement promptly in accordance with Federal Rule of Civil Procedure 26(e) and the Local Rules of the Eastern District of Texas as Plaintiff becomes aware of, generates, or acquires additional knowledge or information responsive to these Interrogatories.

DEFINITIONS

1. “Perceptive,” “Plaintiff,” “You,” and “Your” shall each mean and refer to Plaintiff Perceptive Automata, LLC, including without limitation any parents, subsidiaries, and affiliated entities, predecessors, predecessors-in-interest, or others acting on behalf of or with Plaintiff, including present and past directors, officers, agents, representatives, employees, consultants, attorneys, and entities acting in joint venture or in partnership with, or on behalf of, any Perceptive entity or affiliate.

2. “Tesla” or “Defendant” refers to Tesla, Inc.

3. “Asserted Patents” shall mean U.S. Patent Nos. U.S. Patent No. 10,614,344 (the “344 Patent”), U.S. Patent No. 11,126,889 (the “889 Patent”), U.S. Patent No. 11,467,579 (the “579 Patent”), U.S. Patent No. 11,520,346 (the “346 Patent”), and U.S. Patent No. 11,753,046 (the “046 Patent”), individually or collectively, and any other patent(s) asserted or previously asserted in This Action, as well as any patent applications, provisional patent applications, continuations, or divisional applications related to the Asserted Patents.

4. “Asserted Claims” shall mean the claims of the Asserted Patents that You contend Tesla infringes.

5. “Related Patents” shall mean any patent or patent application related to the Asserted Patents, including without limitation: any continuation, continuation-in-part, divisional, or provisional patent or patent application; any domestic or foreign counterpart patent or patent applications; any patents or patent applications relating to the technologies covered by the Asserted Patents; any patents categorized or otherwise grouped by Plaintiff as pertaining to the technologies covered by the Asserted Patents; and all patents ever included by Plaintiff in a portfolio, category, class, or other group containing any of the Asserted Patents.

6. “This Action,” “This Litigation,” “Related Actions,” or “Related Litigations” shall include the civil actions identified in the caption above.

7. The term “person” or “persons” shall mean any natural person or any business, proprietorship, firm, partnership, corporation, association, organization, or other entity. The acts of a person shall include the acts of directors, owners, members, employees, agents, attorneys, or other representatives acting on the person’s behalf.

8. The singular form of a word should be interpreted in the plural, and the plural form of a word shall be interpreted as singular, whenever appropriate, in order to bring within the scope of the interrogatory any information that might otherwise be considered beyond its scope. Any pronoun shall be construed to refer to the masculine, feminine, or neuter gender as in each case is most appropriate.

9. The use of the present tense shall be construed to include the past tense, and vice versa, so as to make the interrogatory inclusive rather than exclusive.

10. As used herein, “and” and “or” shall be construed conjunctively and disjunctively so as to acquire the broadest meaning possible.

11. As used herein, “any” and “all” shall be construed to mean “each and every,” so as to acquire the broadest meaning possible.

12. As used herein, “include” and “including” shall be construed to mean “without limitation,” so as to give the broadest possible meaning to interrogatories and definitions containing those words.

13. The term “date” or “dates” shall mean the exact date(s), if known, or the closest approximation to the exact date(s) as can be specified, including without limitation the year, month, week in a month, day in a month, or part of a month.

14. The term “entity” means, including without limitation, corporation, company, firm, partnership, joint venture, association, governmental body or agency, or persons other than a natural person.

15. The terms “relate to,” “related to,” and “relating to” shall mean in whole or in part concerning, reflecting, alluding to, mentioning, regarding, discussing, bearing upon, commenting on, constituting, pertaining to, demonstrating, describing, depicting, directly or indirectly relating to, summarizing, containing, embodying, showing, comprising, evidencing, refuting, contradicting, analyzing, identifying, stating, dealing with, and/or supporting.

16. The terms “document(s)” and “thing(s)” are defined broadly to be given the full scope of the terms contemplated in the Federal Rules of Civil Procedure.

17. Where an instruction or interrogatory names a corporation or other legal entity, the instruction or interrogatory includes within its scope any parent, predecessors-in-interest, subsidiaries, affiliates, directors, officers, employees, agents, and representatives thereof, including attorneys, consultants, accountants, and investment bankers.

INSTRUCTIONS

1. In the event that Plaintiff objects to any interrogatory on the ground that it is vague and/or ambiguous, identify the particular words, terms or phrases that are asserted to make such interrogatory vague and/or ambiguous and provide a concrete definition sufficient to allow for an answer.

2. None of the definitions or interrogatories set forth herein shall be construed as an admission relating to the existence of any evidence, to the relevance or admissibility of any evidence, or to the truth or accuracy of any statement or characterization in the definition or interrogatory.

3. If Plaintiff responds to any interrogatory by reference to records from which the answer may be derived or ascertained as permitted in Rule 33(d) of the Federal Rules of Civil Procedure, Plaintiff shall identify the records (e.g., by production Bates number) in sufficient detail to permit Defendant to locate and identify the records and to ascertain the answers as readily as Plaintiff could.

4. All relevant, non-privileged information which You or Your employees possess or control is to be divulged. Should You claim privilege, immunity, confidentiality or protection of any kind as a basis for withholding all or any part of the answer with respect to any Interrogatory, You shall state: the nature of the privilege or doctrine claimed (e.g., attorney-client, work product, etc.); the nature and identity of the attorney or other person with respect to whom the privilege or doctrine is claimed; and the substantive basis for the application of the privilege or doctrine claimed.

INTERROGATORIES

INTERROGATORY NO. 1:

For each Asserted Claim that You contend is entitled to claim priority to one or more earlier patent applications (whether provisional or non-provisional), describe in detail the specific portion of each earlier application that Plaintiff contends provide sufficient written description support for each element of the Asserted Claim.

INTERROGATORY NO. 2:

Describe in detail all offers, discussions, and/or negotiations to license or monetize (in whole or in part) the Asserted Patents, or any Related Patents. For clarity and without limitation, Your response should include an identification of the parties involved and the persons who participated on their behalf; the timing of any such offers, discussions, or negotiations; the outcome and/or pending status of any such offers, discussions, and/or negotiations; the terms of any resulting license(s), sale, or purchase; and the identity of all documents (including license(s) or other agreements) related to any such offers, discussions, or negotiations.

INTERROGATORY NO. 3:

Describe in detail the financial interest of each person having a financial interest in This Action, the Asserted Patents, or Perceptive (whether direct, or indirect), including: the amount or extent of the interest; the person's identity, address, and contact information; the nature of the person's financial interest; and when and how the person acquired their financial interest. For clarity and without limitation, Your response should include a description of any financial interest

connected to the recorded security interest in the asserted patents held by Piccadilly Patent Funding LLC.

INTERROGATORY NO. 4:

Describe in detail all facts and circumstances related to attempts to commercialize the subject matter of the Asserted Patents. For clarity and without limitation, Your response should include (i) all efforts by Perceptive Automata, Inc. to commercialize any ideas or inventions disclosed in the Asserted Patents, (ii) whether and to what extent those efforts were successful, (iii) the circumstances surrounding the conclusion of those efforts, and (iv) any communications, analysis, or documents concerning such commercialization efforts.

INTERROGATORY NO. 5:

For each Asserted Claim, explain in detail all technical benefits from the invention claimed in that claim, including what benefits the invention provides over the prior art (including all prior art systems identified in Tesla's invalidity contentions) and what benefits the claim provides over each other Asserted Claim in the case.

INTERROGATORY NO. 6:

For each Asserted Patent, explain in detail the reason for not disclosing International Publication No. WO2014/210334 ("Cox") to the United States Patent and Trademark Office during prosecution of the Asserted Patents, including an identification of the people most knowledgeable about this decision.

INTERROGATORY NO. 7:

Describe in detail all government funding provided or applied for in relation to the technology described in the Asserted Patents including, but not limited to, contracts, grants, assignments of title or rights, elections to retain title, licenses, disclosures, reports, publications, communications, and/or applications for funding. For clarity and without limitation, Your response should at least include National Science Foundation's Division of Industrial Innovation and Partnerships Award No. 17338497.

Dated: December 5, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served this 5th day of December 2025, by e-mail at the addresses indicated below:

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