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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 MOTIVE TECHNOLOGIES, INC,

12 Plaintiff,

13 v.

14 SAMSARA INC.,

15 Defendant.

CASE NO. 3:24-cv-00902-JD

**PLAINTIFF MOTIVE'S RULE 26(A)(1)
INITIAL DISCLOSURES**

Judge: Hon. James Donato

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**Samsara EX1067
Samsara v. Motive
IPR2026-00034**

1 Pursuant to Federal Rule of Civil Procedure 26(a)(1), plaintiff Motive Technologies, Inc. provides
2 the following disclosures.

3 Motive makes these disclosures subject to and without waiving any applicable privilege, doctrine,
4 or right, including without limitation the attorney-client privilege, the work product doctrine, and all other
5 rights and privileges recognized under the laws of the United States, the State of California, and all other
6 relevant jurisdictions. Motive does not concede the relevance or admissibility of any particular information
7 or witness. Motive's investigation is ongoing, and Motive makes these disclosures based on information
8 currently available to it. Motive reserves the right to amend or supplement these disclosures and to present
9 additional evidence to support their claims and defenses with any filing or during any other proceeding in
10 this action.

11 **I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION (FED. R. CIV. P.**
12 **26(A)(1)(A)(i))**

13 Pursuant to Rule 26(a)(1)(A)(i), Motive identifies the following individuals who are likely to have
14 discoverable information that it may use to support Motive's claims or defenses, unless the use would be
15 solely for impeachment, along with their possible subjects of that information. Motive reserves the right
16 to supplement or amend this witness disclosure pursuant to Rule 26(e) if additional witnesses or subjects
17 are identified. Motive does not identify any retained experts in these disclosures, which will be disclosed
18 pursuant to Rule 26(a)(2) and the Court's procedural schedule, or any individuals whom it would call solely
19 for impeachment.

Name	Contact Information	Subject
Ali Hassan	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '580, '276, and '243 patents
Ahmed Ali	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '580, '276, and '243 patents
Syed Wajahat Ali Shah Kazmi	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '580 and '276 patents
Ijaz Akhter	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '243 patent

Name	Contact Information	Subject
Muhammad Faisal	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '243 patent
Afsheen Rafaqat Ali	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Named inventor of Motive's asserted '243 patent
Motive employee(s) who have knowledge of Motive's financial statements and accounting practices	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Has information related to Motive's revenues and costs, insofar as they relate to Motive's claimed damages and the revenues associated with Motive's accused products / product features
Motive employee(s) or former employee(s) who Samsara named in their website referenced in paragraphs 136-140 of the Second Amended Complaint	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Has information relevant to Motive's claims of unfair competition, defamation, and intentional interference with prospective economic relations
Shoaib Makani	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Has information relevant to Motive's claims of false advertising, fraud, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Robson Grieve	c/o Greenberg Traurig LLP and Williams & Connolly LLP	Has information relevant to Motive's claims of false advertising, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Sanjit Biswas	Unknown	Has information relevant to Motive's claims of false advertising, fraud, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Michael Luis Innocenzi	Unknown	Named inventor of Samsara's asserted '685 patent

Name	Contact Information	Subject
Elias Ray Dykaar	Unknown	Named inventor of Samsara's asserted '685 patent
Maxwell Anton Dergosits	Unknown	Named inventor of Samsara's asserted '685 patent
Ingo Gerhard Wiegand	Unknown	Named inventor of Samsara's asserted '685 patent
John Bicket	Unknown	Named inventor of Samsara's asserted '706 and '041 patents
James Michael Rowson	Unknown	Named inventor of Samsara's asserted '706 and '041 patents
Chase Phillips	Unknown	Named inventor of Samsara's asserted '706 and '041 patents
Samsara employees and agents knowledgeable about Samsara's financial statements and accounting practices	c/o Samsara	Has information related to Samsara's revenues and costs, insofar as they relate to Motive's and Samsara's claimed damages
Samsara employees and agents knowledgeable about Samsara's marketing practices	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, defamation, and intentional interference with prospective economic relations
Samsara employees and agents knowledgeable about Samsara's sales practices	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, defamation, and intentional interference with prospective economic relations
Billy Waldman	Unknown	Has information relevant to Motive's claims of fraud and unfair competition

Name	Contact Information	Subject
Jonte Craighead	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Rushil Goel	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Corbin Muraro	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Kiren Sekar	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Michael Ross	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Sean McGee	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Ishaan Kansal	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Matt Basham	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Alan Liu	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Faiz Abbasi	Unknown	Has information relevant to Motive's claims of fraud and unfair competition
Samsara employees and agents who interacted with Edelman regarding the website referenced in paragraphs 136-140 of the Second Amended Complaint	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, defamation, and intentional interference with prospective economic relations

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Name	Contact Information	Subject
Samsara employees and agents involved in Samsara's attempts to rebut, disprove, or otherwise discredit the VTTI study described at paragraphs 126-132 of the Second Amended Complaint	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, defamation, and intentional interference with prospective economic relations
Samsara employees and agents who interacted with customers, and potential customers, of Motive	c/o Samsara	Has information relevant to Motive's claims of false advertising, fraud, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Samsara employees and agents who interacted with customers, and potential customers, of Samsara	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Samsara employees and agents who participated in the recruiting, soliciting, or hiring of current or former Motive employees	c/o Samsara	Has information relevant to Motive's claims of unfair competition and trade secrets
Former Motive employees who were recruited by Samsara as detailed in paragraphs 66-97 of the Second Amended Complaint	Unknown	Has information relevant to Motive's claims of unfair competition and trade secrets
Samsara employees and agents responsible for creating and distributing Samsara's advertisements and marketing materials	c/o Samsara	Has information relevant to Motive's claims of false advertising, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations

Name	Contact Information	Subject
Samsara employees and agents responsible for substantiating and verifying the claims made by Samsara in its distributed advertisements and marketing materials	c/o Samsara	Has information relevant to Motive’s claims of false advertising, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Samsara employees and agents responsible for testing the performance of Samsara’s products	c/o Samsara	Has information relevant to Motive’s claims of false advertising, unfair competition, trade secrets, defamation, and intentional interference with prospective economic relations
Samsara employees and agents who accessed or used Motive’s platform and products	c/o Samsara	Has information relevant to Motive’s claims of fraud and unfair competition
Samsara employees and agents who received information obtained by Samsara’s access and use of Motive’s platform and products	c/o Samsara	Has information relevant to Motive’s claims of fraud and unfair competition

Motive also incorporates by reference the witnesses and their possible subjects of testimony disclosed by Samsara in its initial disclosures pursuant to Rule 26(a), individuals identified by the parties through discovery, declaration, or other means, individuals whose names appear on produced documents, inventors, and co-inventors of patents and other materials identified as prior art in the courts of this litigation, and authors and co-authors of references identified as prior art in the course of this litigation, as if set forth fully herein.

II. IDENTIFICATION OF RELEVANT DOCUMENTS

Pursuant to Rule 26(a)(1)(A)(ii), Motive identifies the following documents, electronically stored information, and tangible things currently in its possession, custody, or control that it may use to support its claims and defenses, unless the use would be solely for impeachment. Documents that are available include, but are not necessarily limited to the following:

- Source code and technical documentation relating to Motive’s cloud infrastructure (“the

1 Motive cloud”), the Motive Vehicle Gateway, the Motive Asset Gateway, the Motive
2 Environmental Sensor, and the Motive Engine Immobilizer

- 3 • The file histories of Motive’s Asserted Patents
- 4 • Documents tending to show that Samsara has provided Motive customers with false claims
5 regarding the capabilities of Motive’s and Samsara’s product offerings, and that such false
6 statements influenced the purchasing decisions of customers in the vehicle fleet
7 management market to purchase Samsara products instead of Motive products
- 8 • Documents reflecting Samsara employees’ or agents’ access to or use of Motive’s platform
9 and products
- 10 • Documents tending to show Samsara recruitment of Motive employees with knowledge of
11 propriety information of Motive’s dashcam, fleet management solutions, and other products
12 and/or proprietary customer information
- 13 • Records of Samsara’s false public statements regarding Motive
- 14 • Records regarding specific customers impacted by Samsara’s misconduct as set forth in the
15 Second Amended Complaint herein
- 16 • Documents reflecting the information Samsara obtained by its access and use of Motive’s
17 platform and products
- 18 • Documents reflecting the history, creation, and maintenance of the website referenced in
19 paragraphs 136-140 of the Second Amended Complaint
- 20 • Documents reflecting the nature of the relationship between Samsara and Edelman
- 21 • Documents reflecting Samsara’s distribution of the website referenced in paragraphs 136-
22 140 of the Second Amended Complaint to current, former, or prospective customers
- 23 • Documents reflecting Samsara’s attempts to rebut, disprove, or otherwise discredit the
24 VTTI study described at paragraphs 126-132 of the Second Amended Complaint
- 25 • Documents reflecting the relationship and communications between Samsara and VTTI
- 26 • Documents tending to show Samsara distribution of false advertisements regarding the
27 performance of its own products
- 28 • Documents tending to show Samsara distribution of false advertisements regarding the

1 performance of other company's (including Motive's) products

- 2 • Documents reflecting Samsara's efforts to interact with current, former, or prospective
3 Motive customers

4 Motive's investigation into its claims and defenses is ongoing. It reserves all rights to supplement
5 or amend this disclosure pursuant to Rule 26(e) and to use additional documents and information as
6 discovery and investigation proceeds. Motive may rely on documents that are produced by any party to
7 this litigation, or any third party produced through discovery. Motive reserves the right to supplement or
8 modify these disclosures based on information or documents subsequently identified as pertinent to
9 disputed facts. Finally, Motive reserves the right to object to the production of documents and things on
10 any basis, including that the information sought: (i) is not relevant; (ii) is protected from disclosure by
11 any applicable privilege, doctrine, or immunity; (iii) would be unduly burdensome to produce or is not
12 reasonably accessible; (iv) contains third party confidential information and cannot be produced without
13 that party's notification and consent; or (v) constitutes proprietary or trade secret information that should
14 not be produced before an appropriate protective order has been entered.

15 **III. DAMAGES**

16 Pursuant to Rule 26(a)(1)(A)(iii), Motive provides the following preliminary computation of each
17 category of damages it is claiming:

- 18 1) All harm suffered by Motive stemming from the loss of existing customers proximately
19 caused by Samsara's actions, in an amount to be determined by the jury.
- 20 2) All harm suffered by Motive caused by the loss of potential customers who were
21 redirected from Motive to Samsara by Samsara's actions, in an amount to be determined
22 by the jury.
- 23 3) All harm suffered by Motive from the loss of potential customers who were redirected
24 from Motive to any other party by Samsara's actions, in an amount to be determined by
25 the jury.
- 26 4) Actual and presumed damages suffered by Motive for its loss of reputation and standing in
27 the community on the basis of Samsara's defamatory statements, fraudulent behavior, and
28 intentional interference in Motive's prospective economic relations, in an amount to be

1 determined by the jury.

2 5) Actual, presumed, and/or exemplary damages suffered by Motive for Samsara's violation
3 of the Lanham Act, California's Unfair Competition Law, California's Uniform Trade
4 Secrets Act, and Defend Trade Secrets Act.

5 6) An award of punitive damages in an amount sufficient to dissuade Samsara from similar
6 conduct in the future, in an amount to be determined by the jury.

7 7) Patent infringement damages for all infringement of the '580, '276, and '243 patents,
8 including Samsara's profits, but in no event less than a reasonable royalty, which will be
9 disclosed on the schedule set forth in Patent Local Rule 3-8.

10 Motive also seeks prejudgment interest, increased damages, and its costs and attorneys' fees
11 pursuant to 35 U.S.C. §§ 284 and 285, 15 U.S.C. §§ 1125 and 1117, 18 U.S.C. 1836, Cal. Civ. Code
12 §§ 1021.5, 2426.4, or as otherwise permitted by law. The amount of those fees and costs cannot yet be
13 ascertained because the case is not over. Motive reserves the right to supplement this disclosure.

14 **IV. INSURANCE AGREEMENTS**

15 Pursuant to Rule 26(a)(1)(A)(iv), Motive is not presently aware of any applicable insurance
16 agreements.

1 DATED: September 11, 2025

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