

Part 1  
of  
Exhibit D

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 DIGITAL, INC., TERAPIN TECHNOLOGY PTE.,  
 9 LTD. CORPORATION, TERAOPTIX L.P. d/b/a  
 TERAPIN TECHNOLOGY, AUDIOVOX  
 CORPORATION, INITIAL TECHNOLOGY,  
 10 CHANGZHOU SHINCO DIGITAL  
 TECHNOLOGY CO., LTD., SHINCO  
 11 INTERNATIONAL AV CO., ULTIMA  
 ELECTRONICS CORP., ASUSTEK COMPUTER,  
 12 INC., LITE-ON IT CORP., TEAC  
 CORPORATION, TEAC AMERICA, INC.,  
 13 ATRONIX TECHNOLOGY, INC., ASUS  
 COMPUTER INTERNATIONAL, INC., EPO  
 14 SCIENCE AND TECHNOLOGY CO., INC.,  
 MICRO-STAR INTERNATIONAL CO., LTD.,  
 15 and MSI COMPUTER CORP.

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 SAN JOSE DIVISION

20 ZORAN CORPORATION and OAK )  
 TECHNOLOGY, INC., )  
 21 )  
 Plaintiffs, )  
 22 )  
 v. )  
 23 )  
 MEDIATEK, INC., MINTEK DIGITAL, INC., )  
 24 TERAPIN TECHNOLOGY PTE., LTD. )  
 CORPORATION, TERAOPTIX L.P. d/b/a )  
 25 TERAPIN TECHNOLOGY, AUDIOVOX )  
 CORPORATION, INITIAL TECHNOLOGY, )  
 26 CHANGZHOU SHINCO DIGITAL )  
 TECHNOLOGY CO., LTD., SHINCO )  
 27 INTERNATIONAL AV CO., AND ULTIMA )  
 ELECTRONICS CORP., )  
 28 )  
 Defendants. )

CASE NO.: C-04-02619 RMW  
 C-04-04609 RMW

ARTRONIX'S RESPONSE TO  
 PLAINTIFFS' FIRST SET OF  
 DOCUMENT REQUESTS TO  
 DEFENDANT ARTRONIX  
 TECHNOLOGY

**CONFIDENTIAL BUSINESS  
 INFORMATION – SUBJECT TO  
 PROTECTIVE ORDER**

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AND RELATED CROSS-ACTION AND  
COUNTERCLAIMS

Attorneys for Defendants and Counterclaimants  
[continued]  
ASUSTEK COMPUTER, INC., LITE-ON IT  
CORP., TEAC CORPORATION, TEAC  
AMERICA, INC., ATRONIX TECHNOLOGY,  
INC., ASUS COMPUTER INTERNATIONAL,  
INC., EPO SCIENCE AND TECHNOLOGY CO.,  
INC., MICRO-STAR INTERNATIONAL CO.,  
LTD., and MSI COMPUTER CORP.

ZORAN CORPORATION and OAK  
TECHNOLOGY, INC.,

Plaintiffs,

v.

MEDIATEK, INC., ASUSTEK COMPUTER,  
INC., LITE-ON IT CORP., TEAC  
CORPORATION, TEAC AMERICA, INC.,  
ATRONIX TECHNOLOGY, INC., ASUS  
COMPUTER INTERNATIONAL, INC., EPO  
SCIENCE AND TECHNOLOGY CO., INC.,  
MICRO-STAR INTERNATIONAL CO., LTD.,  
and MSI COMPUTER CORP.,

Defendants.

AND RELATED CROSS-ACTION AND  
COUNTERCLAIMS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant and Counter-  
Claimant Artronix Technology (“Artronix”) objects and responds to Plaintiffs and Counter-  
Defendants Zoran Corporation’s and Oak Technology, Inc.’s (collectively “Plaintiffs”) First Set  
of Document Requests.

**RESPONSES TO DOCUMENT REQUESTS**

Artronix incorporates by reference the General Objections set forth in Artronix’s  
Responses to Plaintiffs’ First Set of Interrogatories to Artronix Technology.

1 **GENERAL OBJECTION NO. 1:**

2 Artronix objects to the Requests that documents be produced for inspection and copying  
3 at the offices of counsel for Plaintiffs at 2000 University Avenue, East Palo Alto, CA on the  
4 grounds that said location for inspection and copying is unduly burdensome and oppressive, and  
5 is not reasonable. Many of the documents requested consist of business records of Artronix,  
6 which are maintained at Artronix's offices in Brea, California. Production of said documents for  
7 inspection and copying at a place other than those offices could seriously disrupt Artronix's  
8 business.

9 Without waiving the foregoing objections, Artronix responds that it will produce  
10 responsive documents by mailing copies of such documents to the parties on a mutually  
11 agreeable date or dates.

12 **GENERAL OBJECTION NO. 2:**

13 Artronix objects to the Requests, and to each and every individual request contained  
14 therein, to the extent that they seek documents or information protected by the attorney-client  
15 privilege, or for the work product of Artronix's attorneys, or for otherwise privileged material.  
16 Any inadvertent disclosure of such information shall not be deemed a waiver of the attorney-  
17 client privilege, the work product doctrine, or any other applicable privilege or immunity  
18 recognized by statute or case law.

19 **GENERAL OBJECTION NO. 3:**

20 Artronix objects to each request as unduly burdensome and oppressive to the extent that it  
21 purports to require Artronix to search Artronix facilities and inquire of Artronix employees other  
22 than those facilities and employees that would reasonably be expected to have responsive  
23 information. Artronix's responses are based upon (1) a reasonable search, given the time allotted  
24 to Artronix to respond to the requests, of facilities and files that could reasonably be expected to  
25 contain responsive information, and (2) inquiries of Artronix employees and/or representatives  
26 who could reasonably be expected to possess responsive information. The subject matter of  
27 these requests is under continuing investigation. Accordingly, these responses are limited to and  
28 are applicable only to documents and other information which Defendant's counsel has been able

1 to ascertain and locate as of the date hereof. Artronix expressly reserves the right to use, rely  
2 upon and to offer into evidence any and all documents and other information responsive to these  
3 requests, whether or not presently identified or produced, if the documents or other information  
4 have not been obtained by counsel and deemed responsive by counsel as of the date of this  
5 response, or if the responsiveness of the documents or other information has been overlooked in  
6 good faith, or if an objection is interposed to producing a document or other information.

7 **GENERAL OBJECTION NO. 4:**

8 Artronix objects to the Requests, and to each and every individual request contained  
9 therein, to the extent they require Artronix to search for and reveal privileged information from  
10 its, and its attorneys' litigation files pertaining to the litigation. Artronix will not schedule on its  
11 privilege log any attorney-client privileged materials or materials protected by the attorney work  
12 product doctrine created on or after March 15, 2004 when Plaintiffs filed the Complaint in the  
13 Central District of California alleging infringement of United States Patent Nos. 6,446,736 ("the  
14 '736 patent"), 6,584,527 ("the '527 patent") and 6,546,440 ("the '440 patent").

15 **GENERAL OBJECTION NO. 5:**

16 To the extent that Plaintiffs' Requests seek confidential or proprietary information  
17 pertaining to Artronix's business, trade secrets and/or economic relationships, or to the extent  
18 they seek confidential information which would impinge on the constitutionally protected right  
19 to privacy of individuals, Artronix will only produce such information subject to the terms of  
20 Order No. 2: Protective Order, issued on April 13, 2004 by Administrative Law Judge Luckern  
21 (the "Protective Order") in the ITC Investigation No. 506 ("the current ITC investigation") as  
22 well as the terms of any protective order issued in this action.

23 **GENERAL OBJECTION NO. 6:**

24 Artronix objects to each and every request to the extent that it calls for information that is  
25 confidential or proprietary to, or the trade secrets of, a third party. Each such request is  
26 overbroad, unduly burdensome, oppressive and seeks to impose obligations beyond those  
27 permitted by the Federal Rules of Civil Procedure and Civil Local Rules. Artronix will only  
28 produce such material subject to the terms of the Protective Order.

1 **GENERAL OBJECTION NO. 7:**

2 Artronix objects to each and every request to the extent it seeks information relating to or  
3 revealing its proprietary development activities for products not yet on sale or otherwise  
4 available to the public. The slight relevance, if any, of such highly confidential, trade secret  
5 information is vastly outweighed by the severe prejudice that would result to Artronix were it to  
6 be disclosed or available to competitors of Artronix. Such requests are therefore unduly  
7 burdensome and oppressive, and Artronix will not produce any such information.

8 **GENERAL OBJECTION NO. 8:**

9 Artronix objects to the requests as overbroad, burdensome, and oppressive in that they  
10 seek information from more than two years ago. Unless otherwise noted, Artronix will answer  
11 all requests based on activities and events occurring on or after April 1, 2003.

12 **GENERAL OBJECTION NO. 9:**

13 Artronix objects to the requests to the extent that they seek to impose an obligation to poll  
14 or question purchasers or customers of parts manufactured by Artronix to ascertain the specific  
15 down-stream products, which may incorporate such parts. Such requests are overly broad,  
16 unduly burdensome and oppressive and seek information that is neither relevant nor reasonably  
17 calculated to lead to the discovery of admissible evidence, and Artronix will not produce any  
18 such information.

19 **GENERAL OBJECTION NO. 10:**

20 Artronix objects to the interrogatories to the extent that they seek discovery on subjects  
21 outside the limited scope of permissible discovery as outlined in the Court's December 8, 2004  
22 Case Management Order.

23 **GENERAL OBJECTION NO. 11:**

24 Artronix objects to the requests to the extent that they rely on quotations from  
25 confidential sources in a public document.

26 **GENERAL OBJECTION NO. 12:**

27 Artronix objects to Definition (3)-(4) on the grounds that the terms "subsidiary,"  
28 "division," "affiliate," "predecessor," "successor," "parent," or "related company thereof" are vague,

1 ambiguous, and overbroad. Artronix will construe the terms "Defendant" or "Artronix" to mean  
2 Artronix Technology. Artronix will construe the term "MediaTek" to mean MediaTek, Inc.

3 **GENERAL OBJECTION NO. 13:**

4 Artronix objects to Definition (5) on the grounds that the term "accused product" is vague  
5 and ambiguous to the extent that it intends to implicate products that do not practice functions  
6 relevant to the patents at issue.

7 **GENERAL OBJECTION NO. 14:**

8 Artronix objects to Definition (11) on the grounds that it is overbroad, unduly  
9 burdensome, oppressive, harassing and seeks to impose obligations beyond those permitted by  
10 the Federal Rules of Civil Procedure and Civil Local Rules. Artronix also objects to the extent  
11 that this Definition calls for the production of information or documents protected by the  
12 attorney-client privilege and/or work product doctrine.

13 **GENERAL OBJECTION NO. 15:**

14 Artronix objects to Definition (12) on the grounds that it is vague, ambiguous, overbroad,  
15 unduly burdensome, oppressive and harassing. Artronix will construe the phrase "relate" or  
16 "refer" wherever used in the requests to call for documents or other information that directly  
17 discuss or concern a particular topic.

18 **GENERAL OBJECTION NO. 16:**

19 Artronix objects to Definition (14) on the grounds that it is vague, ambiguous, overbroad,  
20 unduly burdensome, oppressive and harassing. Artronix will construe the terms "sold," "sale,"  
21 "sales," or "selling" wherever used in the Requests to refer to the exchange for consideration of  
22 any of the accused products between Artronix and another entity.

23 **RESPONSES TO DOCUMENT REQUESTS**

24 Artronix expressly incorporates the above General Objections as though set forth fully in  
25 response to each of the following requests, and, to the extent that they are not raised in any  
26 particular response, Artronix does not waive those objections. An answer to a request shall not  
27 be deemed a waiver of any applicable specific or general objection to a request.

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1 Artronix further notes that to the extent that Artronix intends to limit any response based  
2 on a specific objection, Artronix will clearly set forth such limitation in its response.

3 **REQUEST NO. 1:**

4 All documents relating to any analyses, studies, or opinions regarding the validity or  
5 invalidity of the Patent-in-Suit, whether or not tending to support or undermine the validity  
6 thereof.

7 **RESPONSE TO REQUEST NO. 1:**

8 Artronix objects to this Request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
10 Artronix also objects to this request on the grounds that it is outside the limited scope of  
11 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
12 Artronix further objects to this Request to the extent that it seeks information that is protected by  
13 the attorney-client privilege and/or the work product doctrine. Artronix emphasizes that its  
14 investigation into the facts sought by this request is ongoing, and Artronix reserves the right to  
15 supplement or modify its response as it discovers additional information.

16 Subject to and without waiving these objections, Artronix responds that it has already  
17 provided the responsive information in the current ITC investigation. *See* Artronix's  
18 Supplemental Response to Complainants' First Set of Interrogatories No. 11, Respondents'  
19 Amended Identification of Prior Art and Respondents' invalidity expert reports served in ITC  
20 Investigation No. 337-TA-506.

21 **REQUEST NO. 2:**

22 All documents relating to any analyses, studies, or opinions regarding infringement or  
23 non-infringement of the Patent-in-Suit, whether or not tending to support or undermine  
24 Artronix's infringement thereof.

25 **RESPONSE TO REQUEST NO. 2:**

26 Artronix objects to this Request to the extent that it is overbroad, unduly burdensome,  
27 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
28 Artronix also objects to this request on the grounds that it is outside the limited scope of



1 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
2 Artronix further objects to this Request to the extent that it seeks information that is protected by  
3 the attorney-client privilege and/or the work product doctrine. Artronix emphasizes that its  
4 investigation into the facts sought by this request is ongoing, and Artronix reserves the right to  
5 supplement or modify its response as it discovers additional information.

6 Subject to and without waiving these objections, Artronix responds that it has already  
7 provided the responsive information in the current ITC investigation. *See* Respondents' non-  
8 infringement expert reports served in ITC Investigation No. 337-TA-506.

9 **REQUEST NO. 3:**

10 All documents relating to any analyses, studies, or opinions regarding the enforceability  
11 or unenforceability of the Patent-in-Suit, whether or not tending to support or undermine the  
12 enforceability thereof.

13 **RESPONSE TO REQUEST NO. 3:**

14 Artronix objects to this Request to the extent that it is overbroad, unduly burdensome,  
15 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
16 Artronix also objects to this request on the grounds that it is outside the limited scope of  
17 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
18 Artronix further objects to this Request to the extent that it seeks information that is protected by  
19 the attorney-client privilege and/or the work product doctrine. Artronix emphasizes that its  
20 investigation into the facts sought by this request is ongoing, and Artronix reserves the right to  
21 supplement or modify its response as it discovers additional information.

22 Subject to and without waiving these objections, Artronix responds that it has already  
23 provided the responsive information in the current ITC investigation. *See* Artronix's  
24 Supplemental Response to Complainants' First Set of Interrogatories No. 11, Respondents'  
25 Amended Identification of Prior Art and Respondents' invalidity expert reports served in ITC  
26 Investigation No. 337-TA-506.

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1 **REQUEST NO. 4:**

2 Annual, quarterly, and monthly Documents for April 8, 2003 to the present from which  
3 the following may be determined for Artronix's sales of accused products in the United States:

- 4 a. Gross revenues  
5 b. Discounts  
6 c. Net revenues  
7 d. Cost of goods sold  
8 e. Gross profit  
9 f. Operating expenses  
10 g. Operating profit  
11 h. Net profit  
12 i. Contribution margin  
13 j. Allocated overhead expenses and/or other allocated expenses  
14 k. Other sales, general, and administrative expenses

15 **RESPONSE TO REQUEST NO. 4:**

16 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
17 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

18 Artronix also objects to this request on the grounds that it is duplicative and unnecessary.

19 Artronix further objects to this request as vague and ambiguous, particularly with respect to the  
20 following undefined terms "gross revenues," "discounts," "net revenues," "cost of goods sold,"  
21 "gross profits," "operating expenses," "net profit," "contribution margin," "allocated overhead  
22 expenses and/or other allocated expenses."

23 Subject to and without waiving these objections, Artronix responds that it is willing to  
24 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
25 to provide documents relevant to this action.

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1 **REQUEST NO. 5:**

2 For the period between April 8, 2003 and the present, documents sufficient to show gross  
3 and net sales revenues and number of units sold: (1) by customer account; (2) by month, quarter,  
4 and year; and (3) by product/part number for sales of accused products.

5 **RESPONSE TO REQUEST NO. 5:**

6 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
7 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

8 Artronix also objects to this request on the grounds that it is duplicative and unnecessary.

9 Artronix emphasizes that its investigation into the facts sought by this request is ongoing, and

10 Artronix reserves the right to supplement or modify its response as it discovers additional  
11 information.

12 Subject to and without waiving these objections, Artronix responds that it has provided  
13 the responsive information in the current ITC investigation. *See* Artronix 's ITC production with  
14 Bates ranges: ARTEC-ITC-000161 to ARTEC-ITC-000193.

15 **REQUEST NO. 6:**

16 Documents that list all customers that received accused products for sale or other  
17 distribution in the United States from April 8, 2003 to the present, including customer account  
18 number, name, full address, customer key contact person, and any Artronix entity or employee  
19 servicing the account.

20 **RESPONSE TO REQUEST NO. 6:**

21 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
22 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

23 Artronix also objects to this request as duplicative. Artronix emphasizes that its investigation  
24 into the facts sought by this request is ongoing, and Artronix reserves the right to supplement or  
25 modify its response as it discovers additional information.

26 Subject to and without waiving the foregoing objections, Artronix responds that it has  
27 already provided the information sought by this request in the current ITC investigation. *See*

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1 Artronix 's Response to Complainants' First Set of Interrogatories No. 4 as well as its ITC  
2 production with Bates ranges: ARTEC-ITC-000161 to ARTEC-ITC-000193.

3 **REQUEST NO. 7:**

4 For April 8, 2003 to the present, all quarterly and annual income statements, balance  
5 sheets, and cash flow statements prepared in the normal course of business for all Artronix  
6 divisions, business units, affiliates, subsidiaries, and/ or product lines responsible for the design,  
7 procurement, and sale of accused products.

8 **RESPONSE TO REQUEST NO. 7:**

9 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
10 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
11 Artronix also objects to this request on the grounds that it is duplicative and unnecessary.  
12 Artronix emphasizes that its investigation into the facts sought by this request is ongoing, and  
13 Artronix reserves the right to supplement or modify its response as it discovers additional  
14 information.

15 Subject to and without waiving these objections, Artronix responds that it will produce  
16 non-privileged documents responsive to this Request to the extent that they exist and have not  
17 already been produced.

18 **REQUEST NO. 8:**

19 Documents referring or relating to the fixed versus variable nature of the following costs  
20 and/or expenses associated with the accused products:

- 21 a. Cost of goods sold (including, but not limited to, standard material, standard  
22 labor, standard overhead, and variances thereof);
- 23 b. Product procurement costs not included in cost of goods sold as recorded by  
24 Artronix;
- 25 c. Operating Expenses (including, but not limited to, selling, general, and  
26 administrative expenses and all direct and/or allocated costs).

1 **RESPONSE TO REQUEST NO. 8:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
4 Artronix also objects to this request on the grounds that it is duplicative and unnecessary.  
5 Artronix further objects to this request as vague and ambiguous. Artronix emphasizes that its  
6 investigation into the facts sought by this request is ongoing, and Artronix reserves the right to  
7 supplement or modify its response as it discovers additional information.

8 Subject to and without waiving these objections, Artronix responds that it is willing to  
9 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
10 to provide documents relevant to this action.

11 **REQUEST NO. 9:**

12 All documents referring or relating to Artronix's annual research and development  
13 expenditures incurred in connection with the accused products from initial conception to date.

14 **RESPONSE TO REQUEST NO. 9:**

15 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
16 oppressive, vague and not reasonably calculated to lead to the discovery of admissible evidence.  
17 Artronix further objects to this request as vague and ambiguous with respect to the term "initial  
18 conception."

19 Subject to and without waiving these objections, Artronix responds that it is willing to  
20 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
21 to provide documents relevant to this action.

22 **REQUEST NO. 10:**

23 All documents referring or relating to anticipated sales units and/or revenues and/or  
24 profits for the accused products and all Artronix products typically sold in conjunction therewith,  
25 generated by Artronix or other parties on behalf of Artronix from April 8, 2003 to the present  
26 including, but not limited to: pro-forma estimates, projections, forecasts, budgets, marketing  
27 plans, strategic plans, and capital expenditure plans or requests.

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1 **RESPONSE TO REQUEST NO. 10:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Artronix further objects to this request on the grounds that it is vague and ambiguous,  
5 particularly with respect to the undefined terms "anticipated sales units and/or revenues and/or  
6 profits" and "products typically sold."

7 Subject to and without waiving these objections, Artronix responds that it is willing to  
8 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
9 to provide documents relevant to this action.

10 **REQUEST NO. 11:**

11 All documents generated by Artronix or third parties referring or relating to the market(s)  
12 for the accused products, including, but not limited to, documents describing the size, structure,  
13 and composition of the market(s) for the accused products, and Artronix's actual and anticipated  
14 market share in said market(s).

15 **RESPONSE TO REQUEST NO. 11:**

16 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
17 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

18 Artronix further objects to this request on the grounds that it is vague and ambiguous.

19 Subject to and without waiving these objections, Artronix responds that it is willing to  
20 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
21 to provide documents relevant to this action.

22 **REQUEST NO. 12:**

23 All documents generated by Artronix or third parties referring or relating to competitors  
24 in the market(s) for PC optical storage devices, including, but not limited to, competitor sales  
25 data, distribution networks, customer relationships, strengths and weaknesses, and other  
26 competitor information.

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1 **RESPONSE TO REQUEST NO. 12:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Artronix further objects to this request on the grounds that it is vague and ambiguous.

5 Subject to and without waiving these objections, Artronix responds that it is willing to  
6 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
7 to provide documents relevant to this action.

8 **REQUEST NO. 13:**

9 All Documents generated by Artronix or third parties referring or relating to any  
10 relationships that do or may exist between sales of the accused products and sales of other  
11 Artronix products.

12 **RESPONSE TO REQUEST NO. 13:**

13 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
14 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

15 Artronix further objects to this request on the grounds that it is vague and ambiguous.

16 Subject to and without waiving these objections, Artronix responds that it is willing to  
17 meet and confer with Plaintiffs in an effort to understand the relevance of this request as well as  
18 the intended scope of this request.

19 **REQUEST NO. 14:**

20 All Artronix product catalogs, brochures, correspondence, training guides, user or  
21 operator manuals, advertisements, and promotional materials that discuss, mention, refer to,  
22 feature, or describe the accused products.

23 **RESPONSE TO REQUEST NO. 14:**

24 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
25 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

26 Artronix also objects to this request on the grounds that it is outside the limited scope of

27 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

28 Artronix further objects to this request on the grounds that it is vague and ambiguous.

1 **REQUEST NO. 15:**

2 All documents referring or relating to interactions between Artronix and actual or  
3 potential customers for the Accused products, including but not limited to: quotations,  
4 acknowledgements, correspondence, bids, proposals, demonstrations, sales calls reports, meeting  
5 notes, invoices, purchase orders, bills of lading and agreements.

6 **RESPONSE TO REQUEST NO. 15:**

7 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
8 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
9 Artronix also objects to this request on the grounds that it is duplicative and unnecessary.  
10 Artronix further objects to this request on the grounds that it is vague and ambiguous with  
11 respect to the term "interactions."

12 Subject to and without waiving these objections, Artronix responds that it is willing to  
13 meet and confer with Plaintiffs in an effort to understand the relevance of this request as well as  
14 the intended scope of this request.

15 **REQUEST NO. 16:**

16 All documents sufficient to show any serial numbers for any of the accused products and  
17 the present location or disposition of any such serial numbered accused products.

18 **RESPONSE TO REQUEST NO. 16:**

19 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
20 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
21 Artronix also objects to this request on the grounds that it is outside the limited scope of  
22 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
23 Artronix further objects to this request on the grounds that it is vague and ambiguous particularly  
24 with respect to the term "serial number."

25 **REQUEST NO. 17:**

26 All price lists or pricing schedules issued or developed by Artronix and its distributors for  
27 the Accused products from October 15, 2002 to the present.

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1 **RESPONSE TO REQUEST NO. 17:**

2 Artronix objects to this request on the grounds that it seeks information that is not  
3 relevant to any of the claims or defenses that have been asserted in this lawsuit and that cannot  
4 reasonably be calculated to lead to the discovery of admissible evidence. Artronix objects to this  
5 request to the extent that it is overbroad, unduly burdensome and oppressive.

6 Subject to and without waiving these objections Artronix responds that it has produced  
7 related pricing information responsive to this request. See Artronix's ITC production with Bates  
8 ranges: ARTEC-ITC-000161 to ARTEC-ITC-000193.

9 **REQUEST NO. 18:**

10 All documents referring or relating to Artronix's determination of prices for accused  
11 products in competitive situations where Zoran or other third parties were bidding or otherwise  
12 competing for the same customer business.

13 **RESPONSE TO REQUEST NO. 18:**

14 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
15 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
16 Artronix also objects to this request as vague and ambiguous.

17 Subject to and without waiving these objections, Artronix responds that it is willing to  
18 meet and confer with Plaintiffs in an effort to understand the intended scope of this request.

19 **REQUEST NO. 19:**

20 All licenses entered into by Artronix for patents or technology relating to PC optical  
21 storage devices as well as all documents including, correspondence, memoranda, and work  
22 papers, generated by Artronix or others referring or relating to the negotiation of the above  
23 licensing agreements.

24 **RESPONSE TO REQUEST NO. 19:**

25 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
26 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
27 Artronix also objects to this request to the extent that it seeks information that is protected by the  
28 attorney-client privilege and/or the work product doctrine.

1 Subject to and without waiving these objections, Artronix responds that it is willing to  
2 produce one copy of the license agreements entered into by Artronix that relate to the specific  
3 features and functionality of the asserted patents to the extent that they exist and have not already  
4 been produced.

5 **REQUEST NO. 20:**

6 All documents, including correspondence, memoranda, and work papers, generated by  
7 Artronix or others referring or relating to the negotiation of unconsummated licenses for patents  
8 or technology relating to PC optical storage devices.

9 **RESPONSE TO REQUEST NO. 20:**

10 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
11 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
12 Artronix also objects to this request to the extent that it seeks information that is protected by the  
13 attorney-client privilege and/or the work product doctrine.

14 **REQUEST NO. 21:**

15 All documents referring or relating to Artronix policies, procedures, or guidelines in  
16 instances where Artronix has sought (or will seek) intellectual property licenses either as the  
17 licensor or the licensee.

18 **RESPONSE TO REQUEST NO. 21:**

19 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
20 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
21 Artronix also objects to this request to the extent that it seeks information that is protected by the  
22 attorney-client privilege and/or the work product doctrine. Artronix emphasizes that its  
23 investigation into the facts sought by this request is ongoing, and Artronix reserves the right to  
24 supplement or modify its response as it discovers additional information.

25 Subject to and without waiving these objections, Artronix responds that it will produce  
26 non-privileged documents responsive to this Request to the extent that they exist.

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1 **REQUEST NO. 22:**

2 All documents in Artronix's possession that refer or relate to specific intellectual property  
3 licenses in the PC optical storage device industry and/or to customary licensing practices or  
4 norms in said industries.

5 **RESPONSE TO REQUEST NO. 22:**

6 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
7 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
8 Artronix also objects to this request to the extent that it seeks information that is protected by the  
9 attorney-client privilege and/or the work product doctrine. Artronix further objects to this  
10 request as vague and ambiguous.

11 **REQUEST NO. 23:**

12 All shipping records, bills of lading, purchase orders and invoices which show the first  
13 date on which Artronix or a third party (whether or not controlled by Artronix): (1) first  
14 commenced and completed the design of each accused product; (2) first commenced and  
15 completed the development of each accused product; (3) manufactured each accused product; (4)  
16 offered for sale each accused product; (5) sold each accused product and (6) distributed each  
17 accused product.

18 **RESPONSE TO REQUEST NO. 23:**

19 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
20 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
21 Artronix also objects to this request on the grounds that it is outside the limited scope of  
22 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
23 Artronix further objects to this request on the grounds that it is compound, duplicative and  
24 unnecessary. Artronix emphasizes that its investigation into the facts sought by this request is  
25 ongoing, and Artronix reserves the right to supplement or modify its response as it discovers  
26 additional information.

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1 Subject to and without waiving these objections, Artronix responds that it has provided  
2 the responsive information in the current ITC investigation. See Artronix's Response to  
3 Complainants' First Set of Interrogatories No. 6.

4 **REQUEST NO. 24:**

5 All documents concerning any communications within Artronix, or between Artronix and  
6 any other entity, concerning: (a) Artronix's continued use of MediaTek chips in any accused  
7 product, or (b) Artronix's use of any controller chips other than those manufactured by  
8 MediaTek in any accused products, as a result of this litigation.

9 **RESPONSE TO REQUEST NO. 24:**

10 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
11 oppressive and not reasonably calculated to lead to the discovery of admissible evidence. In  
12 addition, Artronix objects to this request on the grounds that it is outside the limited scope of  
13 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
14 Artronix also objects to this request on the grounds that it is vague and ambiguous. Artronix  
15 further objects to this request to the extent that it seeks information that is protected by the  
16 attorney-client privilege and/or the work product doctrine.

17 **REQUEST NO. 25:**

18 All documents referring or relating to Artronix's receipt and/or purchase of accused  
19 products in the United States from any supplier, reseller, importer and/or distributor for the  
20 period between April 8, 2003 and the present.

21 **RESPONSE TO REQUEST NO. 25:**

22 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
23 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
24 Artronix also objects to this request on the grounds that it is vague and ambiguous.

25 Subject to and without waiving these objections, Artronix responds that it is willing to  
26 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
27 to provide documents relevant to this action.

28

1 **REQUEST NO. 26:**

2 All documents relating to any analyses, studies or opinions, including, but not limited to,  
3 opinions of counsel, regarding the infringement or noninfringement by the MT1888 of the  
4 Patents-in-Suit.

5 **RESPONSE TO REQUEST NO. 26:**

6 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
7 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

8 Artronix also objects to this request to the extent that it is outside the limited scope of  
9 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

10 Artronix further objects to this request to the extent that it seeks information that is protected by  
11 the attorney-client privilege and/or the work product doctrine.

12 **REQUEST NO. 27:**

13 All business plans, strategic plans, marketing plans, product plans and meeting minutes  
14 relating to the MT1888.

15 **RESPONSE TO REQUEST NO. 27:**

16 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
17 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

18 Artronix also objects to this request on the grounds that it is outside the limited scope of  
19 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

20 Artronix further objects to this request on the grounds that it is vague and ambiguous.

21 **REQUEST NO. 28:**

22 All documents relating to the design, testing and development of the MT1888, including,  
23 but not limited to, specifications, schematics, block diagrams, data sheets, layouts, databases,  
24 depictions, photographs, simulations, test results, manuals, journals, notes and notebooks.

25 **RESPONSE TO REQUEST NO. 28:**

26 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
27 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

28

1 Artronix also objects to this request on the grounds that it is outside the limited scope of  
2 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

3 **REQUEST NO. 29:**

4 All documents relating to any analysis, discussion or consideration of design, redesign, or  
5 modification of any existing product or new product, including, but not limited to, the MT1888,  
6 to avoid or in light of the claims of the Patents-in-Suit.

7 **RESPONSE TO REQUEST NO. 29:**

8 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

10 Artronix also objects to this request on the grounds that it is outside the limited scope of  
11 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

12 Artronix further objects to this request to the extent that it seeks information that is protected by  
13 the attorney-client privilege and/or the work product doctrine.

14 **REQUEST NO. 30:**

15 All documents relating to design reviews and design review meetings, including but not  
16 limited to, all notes, minutes, reports, action item lists and management summaries, relating to  
17 the MT1888.

18 **RESPONSE TO REQUEST NO. 30:**

19 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
20 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

21 Artronix also objects to this request on the grounds that it is outside the limited scope of  
22 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

23 **REQUEST NO. 31:**

24 All business plans, strategic plans, marketing plans, product plans, and meeting minutes  
25 relating to any design changes or proposed design changes, including, but not limited to, the  
26 MT1888, to avoid or in light of the Patents-in-Suit.

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1 **RESPONSE TO REQUEST NO. 31:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Artronix also objects to this request on the grounds that it is outside the limited scope of  
5 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

6 Artronix further objects to this request to the extent that it seeks information that is protected by  
7 the attorney-client privilege and/or the work product doctrine.

8 **REQUEST NO. 32:**

9 All internal Artronix communications relating to any design changes or proposed design  
10 changes, including, but not limited to, the MT1888, to avoid or in light of the Patents-in-Suit.

11 **RESPONSE TO REQUEST NO. 32:**

12 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
13 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

14 Artronix also objects to this request on the grounds that it is outside the limited scope of  
15 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

16 Artronix further objects to this request to the extent that it seeks information that is protected by  
17 the attorney-client privilege and/or the work product doctrine.

18 **REQUEST NO. 33:**

19 All documents relating to communications between MediaTek and its foundries  
20 including, but not limited to UMC and Silterra, regarding any design, redesign, or modification  
21 of any existing or new product, including but not limited to, the MT1888, to avoid or in light of  
22 the claims of the Patents-in-Suit.

23 **RESPONSE TO REQUEST NO. 33:**

24 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
25 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

26 Artronix also objects to this request on the grounds that it is outside the limited scope of  
27 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

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1 Artronix further objects to this request to the extent that it seeks information that is protected by  
2 the attorney-client privilege and/or the work product doctrine.

3 **REQUEST NO. 34:**

4 All documents relating to MediaTek's communication with any customers or potential  
5 customers, including, but not limited to, Artronix, regarding any design, redesign, or  
6 modification of any design of any existing or new product, including but not limited to, the  
7 MT1888, to avoid or in light of any claims of the Patents-in-Suit.

8 **RESPONSE TO REQUEST NO. 34:**

9 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
10 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
11 Artronix also objects to this request on the grounds that it is outside the limited scope of  
12 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
13 Artronix further objects to this request to the extent that it seeks information that is protected by  
14 the attorney-client privilege and/or the work product doctrine.

15 **REQUEST NO. 35:**

16 All documents relating to the actual or anticipated release and mass production of the  
17 MT1888.

18 **RESPONSE TO REQUEST NO. 35:**

19 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
20 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
21 Artronix also objects to this request on the grounds that it is outside the limited scope of  
22 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

23 **REQUEST NO. 36:**

24 All documents relating to communications between MediaTek and its foundries,  
25 including, but not limited to, UMC and Silterra, regarding the MT1888.

26 **RESPONSE TO REQUEST NO. 36:**

27 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
28 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.



1 Artronix also objects to this request on the grounds that it is outside the limited scope of  
2 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

3 Artronix also objects to this request on the grounds that it is vague and ambiguous.

4 **REQUEST NO. 37:**

5 All documents relating to MediaTek's communication with any customers or potential  
6 customers, including, but not limited to, Artronix, regarding the MT1888.

7 **RESPONSE TO REQUEST NO. 37:**

8 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

10 Artronix also objects to this request on the grounds that it is outside the limited scope of  
11 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

12 Artronix further objects to this request to the extent that it seeks information that is protected by  
13 the attorney-client privilege and/or the work product doctrine.

14 **REQUEST NO. 38:**

15 All documents relating to the February 17, 2005, "substantial design change" to the  
16 MT1888 referenced in the Ladra Letter.

17 **RESPONSE TO REQUEST NO. 38:**

18 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
19 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

20 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,

21 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
22 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix

23 further objects to this request to the extent that it seeks information that is protected by the  
24 attorney-client privilege and/or the work product doctrine.

25 **REQUEST NO. 39:**

26 All documents relating to the "continual design modification" of the MT1888 referenced  
27 in the Ladra Letter.

28

1 **RESPONSE TO REQUEST NO. 39:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
5 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
6 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
7 further objects to this request to the extent that it seeks information that is protected by the  
8 attorney-client privilege and/or the work product doctrine.

9 **REQUEST NO. 40:**

10 All documents relating to the statement in the Ho Declaration that "my engineers are still  
11 in the design process and have, to date, identified between 90-100 problems with the chip, which  
12 will need to be corrected before the MT1888 can be released into mass production."

13 **RESPONSE TO REQUEST NO. 40:**

14 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
15 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
16 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
17 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
18 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
19 further objects to this request to the extent that it seeks information that is protected by the  
20 attorney-client privilege and/or the work product doctrine.

21 **REQUEST NO. 41:**

22 All documents relating to the statement in the Ho Declaration that "some of the known  
23 problems involve the host interface function of the chip."

24 **RESPONSE TO REQUEST NO. 41:**

25 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
26 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
27 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
28 Artronix objects to this request on the grounds that it is outside the limited scope of permissible

1 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
2 further objects to this request to the extent that it seeks information that is protected by the  
3 attorney-client privilege and/or the work product doctrine.

4 **REQUEST NO. 42:**

5 All documents relating to the statement in the Ho Declaration that "[s]ignificant design  
6 changes will have to be made before the chip can be released into mass production."

7 **RESPONSE TO REQUEST NO. 42:**

8 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
10 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
11 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
12 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
13 further objects to this request to the extent that it seeks information that is protected by the  
14 attorney-client privilege and/or the work product doctrine.

15 **REQUEST NO. 43:**

16 All documents relating to the statement in the Ho Declaration that "[m]any of these  
17 problems can only be corrected by making changes to the RTL code, which can be a tedious and  
18 time consuming process."

19 **RESPONSE TO REQUEST NO. 43:**

20 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
21 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
22 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
23 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
24 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
25 further objects to this request to the extent that it seeks information that is protected by the  
26 attorney-client privilege and/or the work product doctrine.

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1 **REQUEST NO. 44:**

2 All documents relating to the statement in the Ho Declaration that “[a]lthough, MediaTek  
3 has scheduled the release of the MT1888 into mass production by second quarter of 2005, this  
4 release date, like many in the industry, is very aggressive considering the significant design  
5 changes which need to be made to the chip. Thus, the MT1888 will certainly not be available on  
6 the market until second quarter 2005 at the very earliest.”

7 **RESPONSE TO REQUEST NO. 44:**

8 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
10 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
11 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
12 discovery topics listed in the Court’s December 8, 2004 Case Management Order. Artronix  
13 further objects to this request to the extent that it seeks information that is protected by the  
14 attorney-client privilege and/or the work product doctrine.

15 **REQUEST NO. 45:**

16 All documents, including, but not limited to the actual design documents, relating to the  
17 statement in the Ho Declaration that “[a]ny design documents dated before first quarter of 2004  
18 reflect a design for the MT1888 that was abandoned and changed significantly during the  
19 ongoing development process of the MT1888.”

20 **RESPONSE TO REQUEST NO. 45:**

21 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
22 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
23 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
24 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
25 discovery topics listed in the Court’s December 8, 2004 Case Management Order. Artronix  
26 further objects to this request to the extent that it seeks information that is protected by the  
27 attorney-client privilege and/or the work product doctrine.

28

1 **REQUEST NO. 46:**

2 All documents sufficient to show Respondents' first knowledge of the Patents-in-Suit.

3 **RESPONSE TO REQUEST NO. 46:**

4 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
5 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
6 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
7 Artronix objects to this request to the extent that it is outside the limited scope of permissible  
8 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
9 further objects to this request to the extent that it seeks information that is protected by the  
10 attorney-client privilege and/or the work product doctrine.

11 **REQUEST NO. 47:**

12 All documents relating to the amounts that Artronix has budgeted or set-aside for  
13 payment of potential future damages or license payments to Plaintiffs with respect to the Patents-  
14 in-Suit.

15 **RESPONSE TO REQUEST NO. 47:**

16 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
17 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
18 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,  
19 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
20 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix  
21 further objects to this request to the extent that it seeks information that is protected by the  
22 attorney-client privilege and/or the work product doctrine.

23 **REQUEST NO. 48:**

24 All documents relating to any agreements (whether formal or informal, oral or written)  
25 between MediaTek and any of its customers, including, but not limited to, Artronix, regarding  
26 the Patents-in-Suit, Plaintiffs' action against Artronix for infringement of the Patents-in-Suit, the  
27 defense of this action, the settlement of this action, or any potential license by Plaintiffs to  
28 MediaTek or its customers under any of the Patents-in-Suit, including any agreement or contract

1 to share the costs of MediaTek's and/or Artronix's defense or to indemnify or pay to MediaTek  
2 and/or Artronix all or any part of any damages that might be awarded to Plaintiffs in any such  
3 action, and any communications between MediaTek and any of its customers regarding such  
4 agreements.

5 **RESPONSE TO REQUEST NO. 48:**

6 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
7 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

8 Artronix also objects to this request on the grounds that it is outside the limited scope of  
9 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

10 Artronix further objects to this request to the extent that it seeks information that is protected by  
11 the attorney-client privilege and/or the work product doctrine.

12 **REQUEST NO. 49:**

13 All documents relating to agreements (whether formal or informal, oral or written) and  
14 communications between MediaTek and any other company that Plaintiffs have charged with  
15 infringement of any of the Patents-in-Suit or against which Plaintiffs have commenced any  
16 action for infringement of any of the Patents-in-Suit regarding the Patents-in-Suit, the offer or  
17 acceptance of any license under the Patents-in-Suit, or the defense or settlement of any action for  
18 infringement of the Patents-in-Suit, including the terms of any such agreements and MediaTek's  
19 and/or Artronix's activities in connection with such agreements.

20 **RESPONSE TO REQUEST NO. 49:**

21 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
22 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

23 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,

24 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
25 discovery topics listed in the Court's December 8, 2004 Case Management Order. Artronix

26 further objects to this request to the extent that it seeks information that is protected by the  
27 attorney-client privilege and/or the work product doctrine.

28

1 **REQUEST NO. 50:**

2 All documents relating to all joint defense or common interest agreements between  
3 Artronix and any other respondent(s) in these proceedings that relate to these proceedings.

4 **RESPONSE TO REQUEST NO. 50:**

5 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
6 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
7 Artronix also objects to this request on the grounds that it is vague and ambiguous with respect  
8 to the terms "these proceedings" and "respondent(s)." In addition, Artronix objects to this  
9 request on the grounds that it is outside the limited scope of permissible discovery topics listed in  
10 the Court's December 8, 2004 Case Management Order. Artronix further objects to this request  
11 to the extent that it seeks information that is protected by the attorney-client privilege and/or the  
12 work product doctrine.

13 **REQUEST NO. 51:**

14 All documents relating to MediaTek's efforts to purchase or acquire some of all of Oak  
15 Technology, Inc.'s patent portfolio, including, but not limited to, the Patents-in-Suit.

16 **RESPONSE TO REQUEST NO. 51:**

17 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
18 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
19 Artronix also objects to this request on the grounds that it is outside the limited scope of  
20 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
21 Artronix further objects to this request to the extent that it seeks information that is protected by  
22 the attorney-client privilege and/or the work product doctrine.

23 **REQUEST NO. 52:**

24 All documents relating to any established policy, guideline, procedure, or program within  
25 Artronix relating to the licensing of patents or other intellectual property (either as the licensor or  
26 as the licensee).

27

28

1 **RESPONSE TO REQUEST NO. 52:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Artronix also objects to this request on the grounds that it is outside the limited scope of  
5 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

6 Artronix further objects to this request to the extent that it seeks information that is protected by  
7 the attorney-client privilege and/or the work product doctrine.

8 **REQUEST NO. 53:**

9 All documents relating to Artronix's capital costs and other borrowing costs during the  
10 period April 8, 2003 to the present.

11 **RESPONSE TO REQUEST NO. 53:**

12 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
13 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

14 Artronix also objects to this request on the grounds that it is outside the limited scope of  
15 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

16 **REQUEST NO. 54:**

17 Documents sufficient to show Artronix's accounting and other business methods, forms,  
18 reports and terminology for compiling, maintaining, recording and analyzing financial data from  
19 April 8, 2003 to the present, including those relating to plans, budgets, forecasts, standard costs,  
20 actual results, and financial reports on a company-wide basis for specific products or product  
21 lines, and for specific accounts, contracts or customers.

22 **RESPONSE TO REQUEST NO. 54:**

23 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
24 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

25 Artronix also objects to this request on the grounds that it is vague and ambiguous. In addition,

26 Artronix objects to this request on the grounds that it is outside the limited scope of permissible  
27 discovery topics listed in the Court's December 8, 2004 Case Management Order.

28



1           Subject to and without waiving these objections, Artronix responds that it is willing to  
2 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
3 to provide documents relevant to this action.

4 **REQUEST NO. 55:**

5           All documents relating Artronix's rate of return on invested capital and Artronix's net  
6 income or net profits during the period April 8, 2003 to the present.

7 **RESPONSE TO REQUEST NO. 55:**

8           Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
9 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
10 Artronix also objects to this request on the grounds that it is outside the limited scope of  
11 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

12           Subject to and without waiving these objections, Artronix responds that it is willing to  
13 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
14 to provide documents relevant to this action.

15 **REQUEST NO. 56:**

16           All documents relating to the rate of return on invested capital and the net income or net  
17 profits typically earned by manufacturers and sellers of optical storage controller chips and  
18 chipsets during the period April 8, 2003 to the present.

19 **RESPONSE TO REQUEST NO. 56:**

20           Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
21 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
22 Artronix also objects to this request on the grounds that it is outside the limited scope of  
23 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.

24 **REQUEST NO. 57:**

25           All documents relating to Artronix's net income and net profits for its optical storage  
26 controller chips and chipsets during the period April 8, 2003 to the present.

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1 **RESPONSE TO REQUEST NO. 57:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiving these objections, Artronix responds that it is willing to  
5 meet and confer with Plaintiffs in an effort to understand the intended scope of this request and  
6 to provide documents relevant to this action.

7 **REQUEST NO. 58:**

8 All documents relating to the identity of any optical storage controller chips and chipsets  
9 that have competed with MediaTek's optical storage controller chips and chipsets since April 8,  
10 2003.

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1 **RESPONSE TO REQUEST NO. 58:**

2 Artronix objects to this request to the extent that it is overbroad, unduly burdensome,  
3 oppressive and not reasonably calculated to lead to the discovery of admissible evidence.  
4 Artronix also objects to this request on the grounds that it is outside the limited scope of  
5 permissible discovery topics listed in the Court's December 8, 2004 Case Management Order.  
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7 Dated: May 23, 2005

Respectfully submitted,

8 WILSON SONSINI GOODRICH & ROSATI  
9 Professional Corporation

10 By: 

11 Michael A. Ladra, Esq.  
12 James C. Otteson, Esq.  
13 Susan A. Callender, Esq.  
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15 Attorneys for Defendants  
16 MEDIATEK, INC., MEDIATEK, INC.,  
17 MINTEK DIGITAL, INC., TERAPIN  
18 TECHNOLOGY PTE., LTD.  
19 CORPORATION, TERAOPTIX L.P. d/b/a  
20 TERAPIN TECHNOLOGY, AUDIOVOX  
21 CORPORATION, INITIAL TECHNOLOGY,  
22 CHANGZHOU SHINCO DIGITAL  
23 TECHNOLOGY CO., LTD., SHINCO  
24 INTERNATIONAL AV CO., ULTIMA  
25 ELECTRONICS CORP., ASUSTEK  
26 COMPUTER, INC., LITE-ON IT CORP.,  
27 TEAC CORPORATION, TEAC AMERICA,  
28 INC., ATRONIX TECHNOLOGY, INC.,  
ASUS COMPUTER INTERNATIONAL,  
INC., EPO SCIENCE AND TECHNOLOGY  
CO., INC., MICRO-STAR  
INTERNATIONAL CO., LTD., and MSI  
COMPUTER CORP.

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Of Counsel for Defendants  
TEAC CORP., TEAC AMERICA, INC.

**CERTIFICATE OF SERVICE**

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I, Virginia Mendoza, declare:

I am employed in Santa Clara County. I am over the age of 18 years and not a party to the within action. My business address is Wilson Sonsini Goodrich & Rosati, 650 Page Mill Road, Palo Alto, California 94304-1050. I am readily familiar with Wilson Sonsini Goodrich & Rosati's practice for collection and processing of correspondence for same-day delivery by messenger. In the ordinary course of business, correspondence would be consigned to a messenger service on this date.

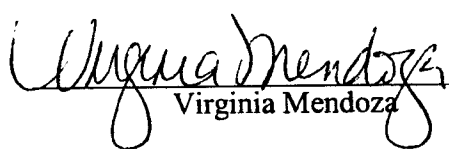
On this date, I caused to be personally served

1. **ARTRONIX'S RESPONSE TO PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT ARTRONIX TECHNOLOGY**

on the person(s) listed below by placing the document(s) described above in an envelope addressed as indicated below, which I sealed. I consigned the envelope(s) to a messenger for hand delivery by placing it/them for collection and processing on this day, following ordinary business practices at Wilson Sonsini Goodrich & Rosati.

Mark Fowler, Esq.  
DLA Piper Rudnick Gray Cary US LLP  
2000 University Avenue  
East Palo Alto, CA 94304

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Palo Alto, California on May 23, 2005.

  
Virginia Mendoza