Part 2
of
Exhibit D

MICHAEL A. LADRA, State Bar No. 64307
JAMES C. OTTESON, State Bar No. 157781
SUSAN A. CALLENDER, State Bar No. 187501
JERRY CHEN, State Bar No. 229318
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, California 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: jotteson@wsgr.com

Attorneys for Defendants and Counterclaimants MEDIATEK, INC., MEDIATEK, INC., MINTEK DIGITAL, INC., TERAPIN TECHNOLOGY PTE., LTD. CORPORATION, TERAOPTIX L.P. d/b/a TERAPIN TECHNOLOGY, AUDIOVOX CORPORATION, INITIAL TECHNOLOGY, CHANGZHOU SHINCO DIGITAL TECHNOLOGY CO., LTD., SHINCO INTERNATIONAL AV CO., ULTIMA ELECTRONICS CORP., 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.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ZORAN CORPORATION and OAK TECHNOLOGY, INC., Plaintiffs, v. MEDIATEK, INC., MINTEK DIGITAL, INC., TERAPIN TECHNOLOGY PTE., LTD. CORPORATION, TERAOPTIX L.P. d/b/a TERAPIN TECHNOLOGY, AUDIOVOX CORPORATION, INITIAL TECHNOLOGY, CHANGZHOU SHINCO DIGITAL TECHNOLOGY CO., LTD., SHINCO INTERNATIONAL AV CO., AND ULTIMA ELECTRONICS CORP., Defendants.	CASE NO.: C-04-02619 RMW C-04-04609 RMW ACI'S RESPONSE TO PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT ASUS COMPUTER INTERNATIONAL, INC. **CONFIDENTIAL BUSINESS INFORMATION – SUBJECT TO PROTECTIVE ORDER**

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 ASUS Computer International ("ACI") 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

ACI incorporates by reference the General Objections set forth in ACI's Responses to Plaintiffs' First Set of Interrogatories to ASUS Computer International.

GENERAL OBJECTION NO. 1:

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

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

GENERAL OBJECTION NO. 2:

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

GENERAL OBJECTION NO. 3:

ACI objects to each request as unduly burdensome and oppressive to the extent that it purports to require ACI to search ACI facilities and inquire of ACI employees other than those facilities and employees that would reasonably be expected to have responsive information. ACI's responses are based upon (1) a reasonable search, given the time allotted to ACI to respond to the requests, of facilities and files that could reasonably be expected to contain responsive information, and (2) inquiries of ACI employees and/or representatives who could reasonably be expected to possess responsive information. The subject matter of these requests is under continuing investigation. Accordingly, these responses are limited to and are applicable only to documents and other information which Defendant's counsel has been able to ascertain and locate as of the date hereof. ACI expressly reserves the right to use, rely upon and to offer

into evidence any and all documents and other information responsive to these requests, whether or not presently identified or produced, if the documents or other information have not been obtained by counsel and deemed responsive by counsel as of the date of this response, or if the responsiveness of the documents or other information has been overlooked in good faith, or if an objection is interposed to producing a document or other information.

GENERAL OBJECTION NO. 4:

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

GENERAL OBJECTION NO. 5:

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

GENERAL OBJECTION NO. 6:

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

GENERAL OBJECTION NO. 7:

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

GENERAL OBJECTION NO. 8:

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

GENERAL OBJECTION NO. 9:

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

GENERAL OBJECTION NO. 10:

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

GENERAL OBJECTION NO. 11:

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

GENERAL OBJECTION NO. 12:

ACI objects to Definition (3)~(4) on the grounds that the terms "subsidiary," "division," "affiliate," "predecessor," "successor," "parent," or "related company thereof" are vague, ambiguous,

and overbroad. ACI will construe the terms "Defendant" or "ACI" to mean ASUS Computer International. ACI will construe the term "MediaTek" to mean MediaTek, Inc.

GENERAL OBJECTION NO. 13:

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

GENERAL OBJECTION NO. 14:

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

GENERAL OBJECTION NO. 15:

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

GENERAL OBJECTION NO. 16:

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

RESPONSES TO DOCUMENT REQUESTS

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

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

REQUEST NO. 1:

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

RESPONSE TO REQUEST NO. 1:

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

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

REQUEST NO. 2:

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

RESPONSE TO REQUEST NO. 2:

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

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

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

REQUEST NO. 3:

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

RESPONSE TO REQUEST NO. 3:

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

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

REQUEST NO. 4:

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

a. Gross revenues

b. Discounts

c. Net revenues

d. Cost of goods sold

e. Gross profit

f. Operating expenses

g. Operating profit

h. Net profit

i. Contribution margin

j. Allocated overhead expenses and/or other allocated expenses

k. Other sales, general, and administrative expenses

RESPONSE TO REQUEST NO. 4:

ACI objects to this request to the extent that it is overbroad, unduly burdensome, oppressive and not reasonably calculated to lead to the discovery of admissible evidence. ACI also objects to this request on the grounds that it is duplicative and unnecessary. ACI further objects to this request as vague and ambiguous, particularly with respect to the following undefined terms" "gross revenues," "discounts," "net revenues," "cost of goods sold," "gross profits," "operating expenses," "net profit," "contribution margin," "allocated overhead expenses and/or other allocated expenses."

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

REQUEST NO. 5:

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

RESPONSE TO REQUEST NO. 5:

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

Subject to and without waiving these objections, ACI responds that it has provided the responsive information in the current ITC investigation. *See* ACI 's ITC production with Bates ranges: ACI-ITC-000334 to ACI-ITC-000370.

REQUEST NO. 6:

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

RESPONSE TO REQUEST NO. 6:

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

Subject to and without waiving the foregoing objections, ACI responds that it has already provided the information sought by this request in the current ITC investigation. *See* ACI 's Response to Complainants' First Set of Interrogatories No. 4 as well as its ITC production with Bates ranges: ACI-ITC-000334 to ACI-ITC-000370.

REQUEST NO. 7:

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

RESPONSE TO REQUEST NO. 7:

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

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

REQUEST NO. 8:

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

a. Cost of goods sold (including, but not limited to, standard material, standard labor, standard overhead, and variances thereof);

b. Product procurement costs not included in cost of goods sold as recorded by ACI;

c. Operating Expenses (including, but not limited to, selling, general, and administrative expenses and all direct and/or allocated costs).

RESPONSE TO REQUEST NO. 8:

ACI objects to this request to the extent that it is overbroad, unduly burdensome, oppressive and not reasonably calculated to lead to the discovery of admissible evidence. ACI also objects to this request on the grounds that it is duplicative and unnecessary. ACI further objects to this request as vague and ambiguous. ACI emphasizes that its investigation into the

facts sought by this request is ongoing, and ACI reserves the right to supplement or modify its response as it discovers additional information.

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

REQUEST NO. 9:

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

RESPONSE TO REQUEST NO. 9:

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

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

REQUEST NO. 10:

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

RESPONSE TO REQUEST NO. 10:

ACI objects to this request to the extent that it is overbroad, unduly burdensome, oppressive and not reasonably calculated to lead to the discovery of admissible evidence. ACI further objects to this request on the grounds that it is vague and ambiguous, particularly with respect to the undefined terms "anticipated sales units and/or revenues and/or profits" and "products typically sold."

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

REQUEST NO. 11:

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

RESPONSE TO REQUEST NO. 11:

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

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

REQUEST NO. 12:

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

RESPONSE TO REQUEST NO. 12:

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

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

REQUEST NO. 13:

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

RESPONSE TO REQUEST NO. 13:

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

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

REQUEST NO. 14:

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

RESPONSE TO REQUEST NO. 14:

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

REQUEST NO. 15:

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

RESPONSE TO REQUEST NO. 15:

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

also objects to this request on the grounds that it is duplicative and unnecessary. ACI further objects to this request on the grounds that it is vague and ambiguous with respect to the term "interactions."

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

REQUEST NO. 16:

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

RESPONSE TO REQUEST NO. 16:

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

REQUEST NO. 17:

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

RESPONSE TO REQUEST NO. 17:

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

Subject to and without waiving these objections ACI responds that it has produced related pricing information responsive to this request. *See* ACI's ITC production with Bates ranges: ACI-ITC-000334 to ACI-ITC-000370.

REQUEST NO. 18:

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

RESPONSE TO REQUEST NO. 18:

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

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

REQUEST NO. 19:

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

RESPONSE TO REQUEST NO. 19:

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

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

REQUEST NO. 20:

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

RESPONSE TO REQUEST NO. 20:

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

REQUEST NO. 21:

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

RESPONSE TO REQUEST NO. 21:

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

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

REQUEST NO. 22:

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

RESPONSE TO REQUEST NO. 22:

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

REQUEST NO. 23:

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

RESPONSE TO REQUEST NO. 23:

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

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

REQUEST NO. 24:

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

RESPONSE TO REQUEST NO. 24:

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

ACI also objects to this request on the grounds that it is vague and ambiguous. ACI further objects to this request to the extent that it seeks information that is protected by the attorney-client privilege and/or the work product doctrine.

REQUEST NO. 25:

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

RESPONSE TO REQUEST NO. 25:

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

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

REQUEST NO. 26:

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

RESPONSE TO REQUEST NO. 26:

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

REQUEST NO. 27:

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

RESPONSE TO REQUEST NO. 27:

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

REQUEST NO. 28:

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

RESPONSE TO REQUEST NO. 28:

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

REQUEST NO. 29:

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

RESPONSE TO REQUEST NO. 29:

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

REQUEST NO. 30:

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

RESPONSE TO REQUEST NO. 30:

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

REQUEST NO. 31:

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

RESPONSE TO REQUEST NO. 31:

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

REQUEST NO. 32:

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

RESPONSE TO REQUEST NO. 32:

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

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

REQUEST NO. 33:

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

RESPONSE TO REQUEST NO. 33:

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

REQUEST NO. 34:

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

RESPONSE TO REQUEST NO. 34:

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

REQUEST NO. 35:

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

RESPONSE TO REQUEST NO. 35:

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

REQUEST NO. 36:

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

RESPONSE TO REQUEST NO. 36:

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

REQUEST NO. 37:

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

RESPONSE TO REQUEST NO. 37:

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

REQUEST NO. 38:

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

RESPONSE TO REQUEST NO. 38:

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

REQUEST NO. 39:

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

RESPONSE TO REQUEST NO. 39:

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

REQUEST NO. 40:

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

RESPONSE TO REQUEST NO. 40:

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

REQUEST NO. 41:

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

RESPONSE TO REQUEST NO. 41:

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

REQUEST NO. 42:

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

RESPONSE TO REQUEST NO. 42:

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

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

REQUEST NO. 43:

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

RESPONSE TO REQUEST NO. 43:

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

REQUEST NO. 44:

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

RESPONSE TO REQUEST NO. 44:

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

REQUEST NO. 45:

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

RESPONSE TO REQUEST NO. 45:

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

REQUEST NO. 46:

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

RESPONSE TO REQUEST NO. 46:

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

REQUEST NO. 47:

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

RESPONSE TO REQUEST NO. 47:

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

REQUEST NO. 48:

All documents relating to any agreements (whether formal or informal, oral or written) between MediaTek and any of its customers, including, but not limited to, ACI, regarding the Patents-in-Suit, Plaintiffs' action against ACI for infringement of the Patents-in-Suit, the defense of this action, the settlement of this action, or any potential license by Plaintiffs to MediaTek or its customers under any of the Patents-in-Suit, including any agreement or contract to share the costs of MediaTek's and/or ACI's defense or to indemnify or pay to MediaTek and/or ACI all or any part of any damages that might be awarded to Plaintiffs in any such action, and any communications between MediaTek and any of its customers regarding such agreements.

RESPONSE TO REQUEST NO. 48:

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

REQUEST NO. 49:

All documents relating to agreements (whether formal or informal, oral or writtent) and communications between MediaTek and any other company that Plaintiffs have charged with infringement of any of the Patents-in-Suit or against which Plaintiffs have commenced any

action for infringement of any of the Patents-in-Suit regarding the Patents-in-Suit, the offer or acceptance of any license under the Patents-in-Suit, or the defense or settlement of any action for infringement of the Patents-in-Suit, including the terms of any such agreements and MediaTek's and/or ACI's activities in connection with such agreements.

RESPONSE TO REQUEST NO. 49:

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

REQUEST NO. 50:

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

RESPONSE TO REQUEST NO. 50:

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

REQUEST NO. 51:

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

RESPONSE TO REQUEST NO. 51:

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

REQUEST NO. 52:

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

RESPONSE TO REQUEST NO. 52:

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

REQUEST NO. 53:

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

RESPONSE TO REQUEST NO. 53:

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

REQUEST NO. 54:

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

RESPONSE TO REQUEST NO. 54:

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

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

REQUEST NO. 55:

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

RESPONSE TO REQUEST NO. 55:

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

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

REQUEST NO. 56:

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

RESPONSE TO REQUEST NO. 56:

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

REQUEST NO. 57:

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

RESPONSE TO REQUEST NO. 57:

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

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

REQUEST NO. 58:

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

RESPONSE TO REQUEST NO. 58:

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

Dated: May 23, 2005

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: _____
Michael A. Ladra, Esq.
James C. Otteson, Esq.
Susan A. Callender, Esq.
Jerry Chen, Esq.

Attorneys for Defendants
MEDIATEK, INC., MEDIATEK, INC., MINTEK DIGITAL, INC., TERAPIN TECHNOLOGY PTE., LTD. CORPORATION, TERAOPTIX L.P. d/b/a TERAPIN TECHNOLOGY, AUDIOVOX CORPORATION, INITIAL TECHNOLOGY, CHANGZHOU SHINCO DIGITAL TECHNOLOGY CO., LTD., SHINCO INTERNATIONAL AV CO., ULTIMA ELECTRONICS CORP., 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.

Mark S. Zolno, Esq.
KATTEN MUCHIN ZAVIS ROSENMAN
525 West Monroe St., Suite 1600
Chicago, Illinois 60661-3693
Tel: (312) 902-5200
Fax: (312) 902-1061

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

CERTIFICATE OF SERVICE

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. **ACI'S RESPONSE TO PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT ASUS COMPUTER INTERNATIONAL, INC.**

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

CERTIFICATE OF SERVICE

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. **ACI'S RESPONSE TO PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT ASUS COMPUTER INTERNATIONAL, INC.**

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