

**MINUTE ENTRY  
NORTH, M.J.  
SEPTEMBER 28, 2022**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**SENSIVA HEALTH, L.L.C.**

**CIVIL ACTION**

**VERSUS**

**NUMBER: 21-598**

**UNIVERSAL MEDITECH, INC., ET AL.**

**SECTION: "T" (5)**

On September 28, 2022, this Court held an oral hearing the Motion for Violation of the Court's Discovery Order (Rec. doc. 150), the Second Motion for Sanctions due to Defendant UMI's Second Violation of a Discovery Order (Rec. doc. 159), a motion to expedite (Rec. doc. 160), and the Motion for Attorney Fees. (Rec. doc. 161). UMI has filed oppositions to the two motions for contempt. (Rec. docs. 158, 163). Present at the hearing were Tarak Anada and Lauren Mastio on behalf of Plaintiffs and Raymond Lewis on behalf of Defendants. For the reasons stated on the record,

**IT IS ORDERED** that UMI supplement its responses to Plaintiffs' interrogatories and requests for production.

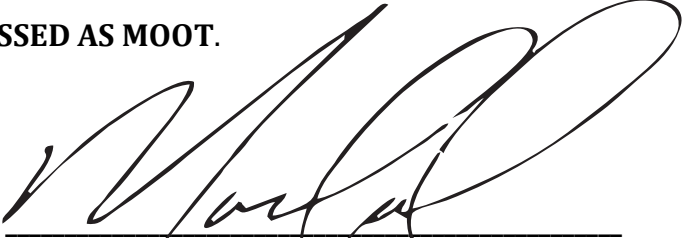
**IT IS FURTHER ORDERED** that Plaintiffs will be permitted to re-depose UMI's witnesses during the now-extended discovery period for the limited purpose of addressing any supplemental productions/responses made after the date of the hearing.

**IT IS FURTHER ORDERED** that any such supplemental productions/responses/information may not be used by any Defendant to counter any dispositive or other motions filed by Plaintiffs on or before the September 28, 2022 motions deadline.

**IT IS FURTHER ORDERED** that Sensiva may reserve its right to seek leave to file an out-of-time motion for adverse inferences regarding any discovery requests to which UMI never responded and that would support Sensiva's claims and defenses, such as Sensiva's discovery requests for UMI's Quality Control Procedure Documentation. While Defendants may oppose any motion for an adverse inference, they may not oppose Sensiva's motion for leave to file such a motion out of time.

**IT IS FURTHER ORDERED** that the work-related computers, email systems, and the platforms, such as Baidu and What's App, used by Zhaoyan (Yan) Wang and Zhaolin Wang who were recently deposed, be searched according to the ESI protocol currently in place (as outlined in Defendants' email to this Court dated September 29, 2022) and that the terms "Aide Biopharmaceuticals" and "Guangdi Packaging Material Company" be added to the list of search terms to be used in the ESI protocol.<sup>1</sup> This shall be completed no later than two (2) weeks from the date of this Minute Entry, and the results must be produced to Plaintiffs no later than two (2) weeks from Friday, September 30, 2022.

**IT IS FURTHER ORDERED** that Motion for Violation of the Court's Discovery Order (Rec. doc. 150), the Second Motion for Sanctions due to Defendant UMI's Second Violation of a Discovery Order (Rec. doc. 159), the motion to expedite (Rec. doc. 160), and the Motion for Attorney Fees (Rec. doc. 161) are **DISMISSED AS MOOT**.

  
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**MICHAEL B. NORTH**  
**UNITED STATES MAGISTRATE JUDGE**

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<sup>1</sup> The entire list of search terms is listed in the correspondence sent to the Court September 29, 2022, which is attached to this Minute Entry.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

SENSIVA HEALTH, LLC \* CIVIL ACTION NO. 21-00598  
\*  
V. \* JUDGE GREG GERARD GUIDRY  
\*  
UNIVERSAL MEDITECH, INC \* MAGISTRATE JUDGE MICHAEL NORTH  
And KAREKIN KHATCHADOORIAN \*  
\*\*\*\*\*

**ESI Plan After September 28, 2022 Hearing with Magistrate Judge**

Defendant, Universal Meditech, Inc. (“UMI”), submits the following ESI Plan to the Court after the instructions from the Court during the September 28, 2022 hearing. The ESI Plan has been developed with input and comment from Plaintiff, Sensiva Health, LLC.

The ESI Plan is as follows:

**A. Collection:**

1. Sources: work-related computers; email correspondence for addresses issued by the company; and other communication platforms, such as Baidu and What’s App.
2. Custodians: Zhaoyan (Yan) Wang; Zhaolin (Lin) Wang
3. Date Range: November 1, 2019 through March 25, 2021

**B. Search Terms:** [both English and Chinese Translations will be searched]

	<i>English</i>	<i>Chinese Translation</i>
1.	Sensiva	
2.	Corneum	
3.	Jolly	
4.	TJ	
5.	Tarun	
6.	Ben	
7.	Williamson	
8.	Donovan	
9.	Blakney	
10.	Jacob	

11.	Jake	
12.	Kurdys	
13.	Jeff	
14.	Johnston	
15.	Karekin	
16.	Khatchadorian	
17.	Jesse	
18.	ZJB	
19.	KK	
20.	Development w/2 Agreement	
21.	SARS-Cov-2	
22.	SARS-Co-2	
23.	Antigen	
24.	Test kit	
25.	Testing kit	
26.	Lateral flow device	
27.	LFD	
28.	Instant and covid	
29.	Home test	
30.	Emergency use authorization	
31.	EUA	
32.	Laboratory developed test	
33.	LDT	
34.	PO-0128	
35.	Specification!	
36.	Bulk shipped	
37.	Vacuum sealed	
38.	Desiccant	
39.	Buffer	
40.	Positive control	
41.	Saliva	
42.	Swish and spit	
43.	Inspect!	
44.	Quality control	
45.	QC testing	
46.	QC evaluation	
47.	January 28, 2021	
48.	1/28/21 or 1/28/2021	
49.	March 4, 2021	
50.	3/4/21 or 3/4/2021	
51.	Letter agreement	
52.	React	
53.	Rapid and covid	
54.	Manufactur!	
55.	Package!	

56.	FDA	
57.	Food and drug administration	
58.	Covidscan	
59.	Cassette!	
60.	Covid-19	
61.	Strips	
62.	10640 Fountains Drive	
63.	Investor	
64.	Distribut!	
65.	Contained and sterile	
66.	Endotoxicity	
67.	VitaPros or Vita-Pros	
68.	Manufactured and America	
69.	Manufactured and USA	
70.	Manufactured and California	
71.	Manufactured and Fresno	
72.	Manufactured and China	
73.	Decheng	
74.	Wondfo	
75.	Hanson	
76.	Flimsy	
77.	Translucent	
78.	“poor quality”	
79.	Quality	
80.	Aide	
81.	Biopharmaceuticals	
82.	Guangdi	
83.	Chromatography	
84.	clam shell	
85.	Clamshell	
86.	Jiabei	
87.	Zhu	
88.	Guandi	
89.	Packaging	

Respectfully submitted,

**Certificate of Service**

I certify this pleading has been served by e-mail, by telefacsimile, or by placing a copy of same in the United States mail, postage prepaid and properly addressed, this 29<sup>th</sup> day of September, 2022.

*/s/ Raymond C. Lewis*

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/s/ Raymond C. Lewis  
Raymond C. Lewis

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