

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AKM ENTERPRISES INC. d/b/a Moblize,	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	Civ. No. 4:23-cv-04144
	§	
RYAN DAWSON	§	
and CORVA AI, LLC,	§	
<i>Defendants.</i>	§	

**DEFENDANTS RYAN DAWSON AND
CORVA AI, LLC’S MOTION FOR SANCTIONS**

Defendants Ryan Dawson and Corva AI, LLC (“Defendants”) file this Motion for Sanctions, and respectfully ask this Honorable Court to levy sanctions against Plaintiff, AKM Enterprises Inc. d/b/a Moblize, and/or its legal counsel, Jaclyn I. Barbosa, Attorney at Law, PLLC and McKnight Law PLLC, as authorized by 28 U.S.C. § 1927, Rule 26(g), and Rule 37(c).

I. STANDARD OF REVIEW

A. 28 U.S.C. § 1927

1. The scope of discovery is limited to “any nonprivileged matter that is relevant to any party’s claim or defense and proportional to the needs of the case.” FED. R. Civ. P. 26(b)(1).

2. This Court’s inherent authority to impose sanctions protects the integrity of the judicial process. Under Section 1927, a court may require any attorney who “multiplies the proceedings in any case unreasonably and vexatiously” to personally pay excess costs

incurred by such conduct. *PrinterOn Inc. v. BreezyPrint Corp.*, 93 F. Supp. 3d 658, 712 (S.D. Tex. 2015). They require “evidence of bad faith, improper motive, or reckless disregard of the duty owed to the court.” *Id.*

B. Rule 26(g)

3. This Court may also impose Rule 26(g) sanctions when a party abuses the discovery process. FED. R. CIV. P. 26(g)(2) (“If a certification violates this rule without substantial justification, the court, on motion or on its own, must impose an appropriate sanction on the signer, the party on whose behalf the signer was acting, or both.”). “Rule 26(g) imposes an affirmative duty to engage in pretrial discovery in a responsible manner that is consistent with the spirit and purposes of Rules 26 through 37,” and “Rule 26(g) is designed to curb discovery abuse by explicitly encouraging the imposition of sanctions.” FED. R. CIV. P. 26(g) advisory committee’s note (1983).

C. Rule 37(c)

4. If a party fails to disclose material that was required to be disclosed under Rule 26(a), that party cannot “use that information or witness to supply evidence on a motion, at a hearing, or at a trial, unless the failure was substantially justified or is harmless.” FED. R. CIV. P. 37(c)(1). In addition to or instead of that sanction, the Court may also award costs and attorneys’ fees to the other parties. FED. R. CIV. P. 37(c)(1)(A).

II. FACTS

5. Mobilize filed this lawsuit on November 1, 2023. (ECF No. 1). Steven Hayes and Samarth Gupte, the former employees who were originally named as defendants in this lawsuit, were allowed to adjudicate their claims in arbitration. (ECF No. 18; ECF No. 19).

The standing Protective Order permits the parties to share discovery between the federal and arbitral proceedings. (ECF No. 71, at § 6).

6. In the arbitration, Steven Hayes served discovery requests on Moblize on April 22, 2025. Ex. A. Six days later, Samarth Gupte served his discovery requests. Ex. B. Moblize did not timely respond to either. When it finally did respond, Moblize served only unverified interrogatory responses devoid of substantive information and produced no documents at all. Ex. C; Ex. D.

7. Both Hayes and Gupte moved to compel with the Arbitrator. The Arbitrator granted the Motion orally, ordering Moblize to comply with certain requests by July 7, and the remainder by July 11.

8. On July 8, 2025, Moblize served its amended discovery responses, producing **2.2 million pages**, after originally producing nothing. Nearly all these documents came from Hayes’s personal hard drives, obtained via an overly broad third-party subpoena. Ex. E; *See* (ECF No. 83, at p. 6) (Corva predicted the issues with Moblize’s overbroad requests, calling them “problematic” for seeking documents on Hayes’s devices, without regard for timeframe and relevance). These included tens of thousands of music files, personal photos, videos, and other irrelevant materials such as application background data. None of this material was requested by Hayes, Gupte, or the Defendants. Yet Moblize designated the entire production as “Confidential-Attorneys’ Eyes Only” and stated that the documents were being produced in both the arbitration and the federal action. Ex. E.

9. Compounding this abuse, Moblize’s amended interrogatory responses made multiple representations that raise serious concerns. For example, Moblize claimed that its experts had reviewed:

- Corva’s codebases,
- Corva’s customer demos and “v2.1 release notes,”
- Corva’s exported binaries,
- Internal Corva design specifications,
- Corva’s code for its NPT normalizer,
- Email correspondence among Corva engineers, and
- Corva’s beta testing end-user reports and internal training materials.

Ex. F, at p. 6-7.

10. These sweeping representations were made without verification and without identifying **any of the experts** allegedly involved. *See* Ex. F. In fact, Moblize has not designated any experts in either the federal or the arbitral proceeding and both designation deadlines have expired.

11. Hayes and Gupte immediately objected. At a July 9 meet-and-confer, Moblize’s counsel represented that its experts had reviewed Corva’s materials found “through GitHub.” *See* Ex. G. Despite being asked by Corva for clarification, Moblize has not provided the sources to the alleged public information nor has Corva been able to verify this representation. In fact, Moblize’s counsel admitted that the accuracy of its

interrogatory answers ***could not be relied upon*** because Moblize’s representative could not verify the answers without edits. *See id.*

12. Counsel also revealed the identities of Moblize’s three experts for the first time and stated that a fourth expert would be added, but Moblize has still not served any expert designations or disclosures as required by the rules.

13. Two days later, Moblize served amended discovery responses. Ex. H. The most troubling statements about access to Corva’s internal files and communications were abruptly removed. Despite this about-face, Moblize continued to invoke its experts’ “opinions” as the basis for various claims.

II. ARGUMENT

A. Moblize’s Production of 2,204,255 Pages Without Review is Discovery Abuse

14. After initially producing zero (0) pages in an untimely response to Respondent’s discovery requests, Moblize dumped over 2.2 million pages—**every single one designated as “Confidential-Attorneys’ Eyes Only”**—following an order compelling production. Moblize made clear this production was intended to serve both the arbitration and this federal proceeding. Ex. E.

15. Moblize strategically circumvented the arbitration by serving an overbroad third-party subpoena on Hayes, requesting, among other things, “All Documents and/or Communications that were saved to Your devices listed below.” Ex. I. That subpoena pulled in tens of thousands of irrelevant files (music, personal photos, and unrelated data), none of which were requested by Respondents or Defendants. In bad faith, Moblize then

produced the entire contents of Hayes's devices wholesale, in response to Gupte's and Hayes's discovery requests, and designated them as "Confidential-Attorneys' Eyes Only."

16. When asked why it produced tens of thousands of irrelevant personal files, including music and photographs, Moblize's counsel simply responded: "The production was too large and produced too late for us to have an opportunity to fully review the documents" and "we have not had the time from its production to review it all." Ex. E.

17. Moblize's position is untenable. It cannot use its own delay as a pretext to offload the burden of proper review onto Defendants. Producing millions of pages without conducting any diligence is weaponized inefficiency. Moblize mass-produced hundreds of thousands of documents, without review, and now claims that its inability to conduct basic diligence justifies the production. This production unreasonably inflates the discovery record and forces Respondents and Defendants to incur unnecessary, substantial expense as actual responsive material, if any, is buried among an overflow of clearly irrelevant documents.

18. The Rules do not permit a party to create a document dump as a substitute for proper discovery, and courts sanction this kind of behavior when it prejudices the opposing party and burdens the litigation process.

19. To make matters worse, Moblize designated the entire production, including files like ABBA's *Dancing Queen* (MOBLIZE0222271), as "Confidential-Attorneys' Eyes Only." Blanket confidentiality designations undermine the purpose of the protective order and warrant court intervention and sanctions. *PPD Enters., LLC v. Stryker Corp.*, No. H-16-0507, 2017 U.S. Dist. LEXIS 152110, at *3-4 (S.D. Tex. 2017) (finding that the

defendants “made no attempt to conduct a good faith, document-by-document review of its production in order to determine which might truly deserve confidentiality protection, and which might not,” and cautioning that over-designations could result in unsealing and monetary sanctions of \$1,000 per document). The standing Protective Order requires parties to “use reasonable care to avoid designating as confidential documents or information that does not need to be designated as such.” (ECF No. 71, at § 15). Mobilize’s overbroad request and then mass production is not only discovery abuse but violative of the Protective Order.

20. To compound issues, not only did Mobilize produce a massive number of irrelevant documents, but it also cited specific irrelevant documents in response to highly targeted discovery requests.

21. For example, in both its Amended Response and Second Amended Response to Gupte’s request to produce “All documents reflecting the development history of ProINSIGHT, including planning documents, specifications, and release notes from 2018-2020,” Mobilize specifically cites the Gupte Autoforwarding report (MOBLIZE000055), a contract from twenty-five years ago (MOBLIZE0172625), and Jimmy Buffett’s classic, *Son of a Son of a Sailor* (MOBLIZE0223583), among a horde of other non-responsive documents, spanning the course of 44 pages. Ex. F, at p. 17, 26, 29; Ex. H, at p. 21, 31, 34; Ex. J, Ex. K, Ex. L.

22. Simply put, it appears Mobilize has intentionally buried the key documents it intends to rely upon within this sprawling, irrelevant production by using false citations, making it nearly impossible for Defendants to discern the actual basis for its claims. This

tactic obstructs fair notice and forces Defendants to waste significant resources combing through irrelevant material in an attempt to reverse-engineer the basis of Moblize's case. This is strategic obfuscation.

23. Moblize's misuse of subpoena power, failure to review, blanket designations, false citations, and tactical document burying, reflects a pattern of discovery abuse that has prejudiced Defendants and burdened the litigation process. Sanctions are warranted.

B. Moblize's Fabricated and Sanctionable Interrogatory Response

24. Plaintiff's interrogatory responses were knowingly false, evasive, and unverified. On June 4, Moblize served interrogatory responses to Defendant Samarth Gupte that were skeletal and clearly drafted by someone lacking technical understanding. The responses were unverified and devoid of any substance. Ex. D.

25. On July 7—after Gupte moved to compel substantive responses—Moblize served its first amended interrogatory responses. Ex. F. These responses were now suddenly detailed, technical, and fundamentally inconsistent with the June 4 responses. *Compare* Ex. F, response to Interrogatory No. 2, *with* Ex. D, response to Interrogatory No. 2. They were also unverified. Moblize offers no explanation for how its understanding changed so drastically in just 30 days.

26. Moblize's July 7 response to Gupte Interrogatory No. 2 ("Interrogatory No. 2") is either an outright fabrication or a stunning admission of trade secret theft. In either scenario, Moblize has violated its discovery obligations. If Moblize truly obtained the referenced Corva materials, then it has admitted to unauthorized access and misappropriation. If not, then Moblize deliberately inserted fictitious and inflammatory

claims into its responses—unverified, no less—*even after the Arbitrator ordered verified interrogatory answers.*

27. These tactics reflect a clear violation of Rule 26(g), which requires that discovery responses be truthful, complete, and made after a reasonable inquiry. Moblize has done the opposite, serving wildly accusatory, facially unverified responses that it has since walked back. This is sanctionable misconduct.

28. Defendant has spent significant time analyzing Moblize’s story, along with the hundreds of thousands of seemingly irrelevant documents that Moblize has produced.

29. Defendants have made good faith efforts to resolve these discovery disputes without court intervention by immediately having a meet-and-confer with Moblize’s counsel on July 9, 2025. Moblize’s counsel dishonestly claimed that its experts (who are still undesignated) were able to access Corva’s code through public GitHub repositories. When asked to produce those repositories, Moblize’s counsel was unable to do so. Ex. G. The supposed “public” materials Moblize cited are nowhere to be found because they never existed in the first place.

30. Compounding the misconduct, Moblize then retracted its original claims and substituted vague, speculative language from unnamed experts. Ex. H, at p. 12. Moblize’s second amended interrogatory response to Interrogatory No. 2 is a belated attempt to backpedal from a discovery response that was drafted recklessly and weaponized to threaten the other side.

31. Moblize’s counsel’s false certification of its amended interrogatory responses violates Rule 26(g), which was designed to deter precisely this kind of bad faith

conduct. Moblize's gamesmanship has imposed substantial and unnecessary costs on Defendants, who have acted in good faith throughout this process. Sanctions are appropriate both to compensate for that prejudice and to deter Moblize from further abusing the discovery process.

32. If Moblize truly possesses the "email correspondence among Corva engineers" it referenced, where Mr. Gupte supposedly admitted to "reusing Moblize's code," it should have produced it long ago. Its failure to do so, combined with its quiet retreat from its original accusations, confirms that Moblize never had such evidence. The only logical conclusion is that Moblize knowingly served false discovery responses to gain tactical advantage in bad faith.

C. Moblize's Improper Reliance on Undesignated Expert Opinions

33. Moblize has repeatedly relied on so-called "expert conclusions" to justify its discovery responses and its evolving theory of liability. But Moblize has never formally disclosed any expert under Rule 26(a)(2), nor has it sought leave to designate one. This raises the question of when Moblize intends to request leave in both proceedings to designate such. Moblize's counsel, already having exhibited dilatory conduct at every stage of the proceedings, is intending to ambush both the Defendants and the Respondents with their experts' opinions.

34. This maneuver is not a mere oversight. It is a deliberate litigation tactic designed to shield Moblize from the obligations and deadlines that come with proper expert designation, while still gaining the benefit of expert opinion to prop up otherwise unsupported claims.

35. This strategy is particularly prejudicial here. Moblize has cited “preliminary expert analysis” as the basis for inflammatory interrogatory responses—statements so sensational that Moblize later withdrew them under pressure, replacing them with vague speculation. Moblize’s counsel then doubled down, referencing its experts in meet-and-confer discussions to justify its bombshell claims. And yet, when asked for the materials they reviewed, Moblize went silent.

36. Moblize’s tactic is transparent. It is attempting to launder its narrative through undesignated experts without giving Defendants any opportunity to test the foundation of those opinions. This is textbook trial by ambush.

37. Moblize’s conduct underscores a broader pattern in this case: delay, obfuscation, and disregard for the deadlines in this case. The rules governing expert disclosure are not optional. Nor are they a matter of gamesmanship. The fact that Moblize has withheld this information, while continuing to cite expert analysis as a basis for its interrogatory responses and its litigation strategy, warrants sanctions.

D. Moblize Has Flouted Its Discovery Obligations, Breached the Protective Order, and Stonewalled Corva’s Inquiries

38. Moblize’s conduct throughout discovery reflects a troubling disregard for both the rules of this proceeding and the protections this Court put in place to safeguard highly sensitive materials. Most egregiously, Moblize violated the standing Protective Order by disclosing Corva’s confidential information to at least one individual who was not authorized to receive it. Corva raised this issue directly with Moblize. Ex. M. Moblize

did not deny the violation, nor did it offer an explanation. It simply ignored the issue, as if the Protective Order were optional.

39. Corva also asked Moblize to substantiate the sensational claims it made in Interrogatory No. 2—claims that, if true, would have serious implications for Corva’s proprietary technologies. Ex. G. Moblize represented that its experts reviewed Corva’s codebases, obtained internal release notes and customer demos, and located “internal Corva design specifications.” Corva responded promptly, in good faith, asking for the basic underlying sources: links, documents, Bates numbers, even a copy of an email that Moblize claimed it had received. *Id.* Moblize has never responded.

40. This was not a minor oversight. Moblize’s refusal to clarify the foundation of its own experts’ opinions deprived Corva of the opportunity to investigate the alleged disclosure of its trade secrets. Worse, it raises serious questions about whether those materials ever existed—or whether Moblize’s experts exaggerated their findings to justify otherwise baseless accusations.

E. Relief

41. Moblize’s pattern of discovery misconduct, including its baseless interrogatory responses, reliance on undisclosed expert opinions, and refusal to meaningfully participate in discovery, has caused Defendants to incur unnecessary legal fees and costs. Accordingly, Defendants request that the Court order Moblize to reimburse Defendants for the attorney time and expenses necessitated by Moblize’s misconduct. Defendants seek:

- a. \$7700, in fees incurred reviewing Mobilize's deficient document productions, preparing correspondence and meet-and-confer efforts, reviewing the Protective Order, and drafting a motion to compel in the arbitral proceedings; and
- b. \$1200, in fees, assessed directly against Mobilize's counsel, for knowingly serving unverified and inflammatory interrogatory responses that required Corva's CTO to personally review and refute technical assertions made without basis; and
- c. \$5300 in fees incurred in preparing and drafting this Motion for Sanctions; and
- d. An order precluding Mobilize from introducing or relying on any expert opinions or testimony in either proceeding, whether in connection with motions, discovery responses, or at trial or hearing, as a consequence of its failure to timely designate experts and its improper use of purported expert analysis to justify sworn interrogatory responses.

Ex. N.

42. In addition, Defendants request that the Court order Mobilize to show cause as to the basis for its First Amended Response to Gupte's Interrogatory No. 2. If Mobilize's bombshell statements are true, it must identify and disclose the source. If not, Mobilize should be required to explain why it made knowingly false or unsubstantiated claims about the Defendants. Either way, Mobilize should not be permitted to inject fiction into sworn discovery responses and then retreat behind vague references to "expert analysis" when challenged.

Defendants prays that this Court enter an Order GRANTING Defendants Motion for Sanctions in all things, and for such other and further relief to which Defendant may be justly entitled, at both law and equity.

Respectfully submitted,

JOHNSON DELUCA KURISKY & GOULD, PC

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**ATTORNEYS FOR CORVA AI, LLC
AND RYAN DAWSON**

CERTIFICATE OF CONFERENCE

I certify that I conferred with opposing counsel regarding the discovery disputes that led to this Motion for Sanctions, including the joint letter to the Court and several email exchanges.

/s/ Omid Abaei

Omid Abaei

CERTIFICATE OF SERVICE

I hereby certify that, on the 1st day of August 2025, a true and correct copy of the above document was forwarded to all parties of record via Certified Mail, Electronic Mail, Facsimile, Regular Mail and/or Hand Delivery:

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***Attorneys for Plaintiff AKM
Enterprises, Inc. d/b/a Moblize***

/s/ Bradley L. DeLuca

Bradley L. DeLuca

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AKM ENTERPRISES INC. d/b/a Moblize,	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	Civ. No. 4:23-cv-04144
	§	
RYAN DAWSON	§	
and CORVA AI, LLC,	§	
<i>Defendants.</i>	§	

**ORDER ON DEFENDANTS RYAN DAWSON
AND CORVA AI, LLC'S MOTION FOR SANCTIONS**

Before the Court is Defendants' Motion for Sanctions against Plaintiff Moblize. Having considered the Motion, the briefing and evidence submitted in support thereof, and any response and reply, the Court finds that the Motion should be and is hereby GRANTED.

The Court finds that Plaintiff Moblize has engaged in a pattern of discovery misconduct, including but not limited to: (1) serving baseless and unverified interrogatory responses; (2) mass producing irrelevant documents without review and abusing the confidentiality designations set forth by the standing Protective Order; and (3) improperly relying on undisclosed expert opinions. As a result of this conduct, Defendants have incurred unnecessary legal fees and expenses.

Accordingly, the Court ORDERS as follows:

Plaintiff Moblize shall reimburse Defendants for attorney's fees and expenses incurred as a result of Moblize's discovery misconduct in the amount of \$14,200, broken down as follows:

- a. \$7,700 in fees incurred reviewing Moblize's irrelevant document productions, preparing correspondence and meet-and-confer efforts, reviewing the Protective Order, and drafting a motion to compel in the related arbitral proceedings;
- b. \$1,200 in fees, assessed directly against Moblize's counsel, for knowingly serving unverified and inflammatory interrogatory responses that required Corva's Chief Technology Officer Jeff Jensen to personally review and refute technical assertions made without basis;
- c. \$5,300 in fees incurred in preparing and drafting the Motion for Sanctions.

Plaintiff Moblize is also hereby precluded from introducing or relying on any expert opinions or testimony in this matter, including but not limited to motions practice, discovery responses, hearings, or trial. This sanction is imposed in light of Moblize's failure to timely designate expert witnesses and its improper reliance on undisclosed expert analysis to support its certified interrogatory responses and other briefings.

Plaintiff Moblize is also ORDERED TO SHOW CAUSE within seven days of the date of this Order regarding the basis for its First Amended Response to Gupte's Interrogatory No. 2.

Failure to adequately respond to the Order to Show Cause may result in additional sanctions, including evidentiary or issue-preclusion sanctions, as the court deems appropriate.

IT IS SO ORDERED

SIGNED this _____ day of _____, 2025.

JUDGE PRESIDING

AMERICAN ARBITRATION ASSOCIATION

AKM ENTERPRISES INC d/b/a MOBLIZE,	§	
<i>Claimant,</i>	§	
	§	
v.	§	
	§	
STEVEN LEE HAYES, JR.; AND	§	Case No. 01-24-0000-8025
SAMARTH GUPTE,	§	
<i>Respondents.</i>	§	
	§	
	§	

**RESPONDENT STEVEN LEE HAYES, JR.'S FIRST REQUESTS FOR
PRODUCTION AND INTERROGATORIES TO CLAIMANT AKM
ENTERPRISES INC. D/B/A MOBLIZE**

To: Claimant AKM Enterprises Inc. d/b/a Moblize, through its attorney of record, Jaclyn I. Barbosa, Attorney at Law, PLLC, 2339 Commerce Street, Suite 102, Houston, Texas 77002.

Respondent Steven Lee Hayes Jr. serves his First Request for Production and First Set of Interrogatories to Respondent AKM ENTERPRISES INC. D/B/A MOBLIZE produce and permit Respondent to inspect and copy the documents designated below at the offices of ANDREWS MYERS, P.C., 1885 Saint James Place, 15th Floor, Houston, Texas 77056, thirty (30) days after service of this request.

If, in response to any requests, there are any documents requested which are not produced because of a claim of privilege or for any other reason, Claimant is requested to note the failure to produce as an objection to the request and comply with the request to the extent that it is not subject to the objection. Any such objection should identify the documents not produced by date, type of document, author, all recipients, the type of privilege asserted, and the basis thereof.

EXHIBIT A

If, in response to any requests, there are any documents requested which are not produced because such documents have been destroyed, Claimant is requested to note the failure to produce, and to state when and under what circumstances such document was destroyed.

Respectfully submitted,

ANDREWS MYERS, P.C.

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**ATTORNEYS FOR RESPONDENT
STEVEN LEE HAYES, JR.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has been served upon all counsel of record by email on this 22nd day of April 2025.

VIA E-SERVICE

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Houston, Texas 77010

Attorneys for Respondent
Samarth Gupte

/s/ Elliot J. Kudisch

INSTRUCTIONS FOR DISCOVERY REQUESTS

1. Documents responsive to these Requests for Production shall be produced by email to the attorneys listed above at the offices of Andrews Myers, P.C., 1885 Saint James Place, 15th Floor, Houston, Texas 77056, in compliance with Rule 196 or as directed by the Arbitrator's order.
2. If any items responsive to any request are known by you to exist but are not in your possession or the possession of your agents, Respondent requests that you so indicate and produce items that show the name of the person or entity in whose custody such items reside. If any items responsive to any request have been lost, mutilated, or destroyed, so state and identify each such document, the time, and circumstances under which same occurred, and state to which request(s) the document would have been responsive.
3. If any Request herein cannot be complied with in full, it shall be complied with to the extent possible with an explanation as to why full compliance is not possible. For example, if responsive electronic files cannot be produced because of technical issues with the files (e.g., corrupted files, password protected files, etc.), you are instructed to identify such electronic files to that the parties can discuss appropriate steps to produce those files or otherwise make them accessible.
4. If there are no items in your possession, custody, or control which are responsive to a particular request, so state and identify such request.
5. You must also supplement your responses to include information acquired at a later date if you obtain information upon the basis of which: (i) you know that your response was incorrect or incomplete when made, or (ii) you knew that, although your response was correct and complete when made, the response is no longer true and complete and the circumstances are such that failure to amend the response is in substance misleading.
6. Unless otherwise specified, the relevant time period for the Requests for Production and Interrogatories are from January 1, 2018 to the present.

INSTRUCTIONS FOR INTERROGATORIES

1. If Claimant claims any communication or document responsive to one or more of the following Interrogatories is privileged or otherwise protected from discovery, Claimant is to give for each such communication or document:
 - a. The date of the communication or document;
 - b. Identity of the people who are parties to the communication, or who made and received the document and all copies thereof;
 - c. The subject matter with which the document or communication is concerned;
 - d. Identify the Interrogatories to which communication or document is responsive; and
 - e. The grounds upon which Claimant relies in claiming that the communication or document is privileged or otherwise cloaked from discovery.
2. Identifying a Person. When identifying or describing a person or entity, please state the following:
 - a. Their full name.
 - b. Their present or last known address and telephone number.
 - c. Their present occupation, job title, employer, and employer's address.
 - d. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the request, and identify the officer who is responsible for supervising that officer or employee.
3. The answers to these Interrogatories shall be made under oath separately and fully in writing within thirty (30) days after the service of such Interrogatories and shall be delivered to the undersigned attorney of record. You are further charged with the duty, as imposed upon you by the AAA and the Federal Rules of Civil Procedure, to supplement these answers if you later obtain information upon which:

- a. You or your attorney know your answer to one or more of the attached Interrogatories was incorrect or incomplete when made; or
- b. You or your attorney knows that your answer to one or more of the attached Interrogatories is no longer true and complete, and the circumstances are such that a failure to amend the answer is in substance misleading.

These Instructions and the definition of “Documents” below are intended to include electronic or magnetic data as permitted under Federal Rule of Civil Procedure 34.

DEFINITIONS

The following definitions shall have the following meanings, unless the context requires otherwise:

1. “Moblize” means Claimant, AKM Enterprises, Inc. d/b/a Moblize, its successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, representatives and all other persons acting on their behalf, its successors, predecessors, divisions, and subsidiaries, or under its control, whether directly or indirectly.

2. “Mr. Hayes” means Respondent, Steven Lee Hayes, Jr.

3. “Mr. Gupte” means Respondent, Samarth Gupte.

4. “Mr. Dawson” means Respondent, Ryan Dawson.

5. “Corva” means Respondent, Corva AI, LLC, its successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, representatives and all other persons acting on their behalf, its successors, predecessors, divisions, and subsidiaries, or under its control, whether directly or indirectly

6. The “Statement of Claims” means the Amended Statement of Claims, including any subsequent amendments, that Moblize filed in the pending arbitration.

7. The “Gupte Agreement” means the Employment Agreement entered on or around May 21, 2018 between Mr. Gupte and Moblize, attached as Exhibit 1 of the Statement of Claims.

8. The “Hayes Agreement” means the Employment Agreement entered on or around August 31, 2018 between Mr. Hayes and Moblize, attached as Exhibit 2 of the Statement of Claims.

9. The “Ethics Policy” means the Ethics Policy, attached as Exhibit 3 of the Statement of Claims.

10. The “Clean Desk Policy” means the Clean Desk Policy, attached as Exhibit 4 of the Statement of Claims.

11. The “IT Guidelines” means the General IT Policy Guidelines, attached as Exhibits 5 and 6 of the Statement of Claims.

12. The “Acceptable Use Policy” means the Acceptable Use Policy, attached as Exhibit 7 of the Statement of Claims.

13. The “Software Installation Policy” means the Software Installation Policy, attached as Exhibit 8 of the Statement of Claims.

14. The “Removable Media Policy” means the Removable Media Policy, attached as Exhibit 9 of the Statement of Claims.

15. The “Email Policy” means the Email Policy, attached as Exhibit 10 of the Statement of Claims.

16. The “Gupte Affidavit” means the Affidavit of Mr. Gupte, attached as Exhibit 11 of the Statement of Claims.

17. The “Demand” means the letter dated February 16, 2021 from Mobilize to Mr. Hayes, attached as Exhibit 12 of the Statement of Claims.

18. “Documents” shall mean all writings and recordings of any kind, which are in your possession, custody or control, including the original and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise. This includes all data or data compilations stored in any medium from which information can be obtained, including all **electronically stored information**. “Documents” shall include, without limitation, acceptances, accounts, advertisements, agreements, analyses, applications, appointment books, approvals, assignments, audio recordings, bids, bonds, bookkeeping records, booklets, books, brochures, bulletins, calculations, calendars, call reports, catalogs, certificates for payment, charts, checks, circulars, computer printouts, contracts, correspondence, daily logs, data processing cards, data processing tapes, data sheets, databases, delivery tickets, diaries, drafts, drawings, email and attachments, engineering reports, estimates, expert reports, financial instructions, financial records, financial statements, financing documents, graphs, indices, inspection reports, instant messages, instructions, interoffice and/or intraoffice communications, invoices, journals, labels, leases, ledgers, letters, licenses, lists, logs, manifests, manuals, meeting minutes, memoranda, notations, notebooks, notes, notes or memoranda of understanding, notices, offers, outlines, pamphlets, pay stubs, payment applications, payments, periodicals, permits, photographs, photographic records, plans, publications, purchase orders, receipts, recordings, releases, reports, requests for proposal, returns, schedules, sketches, sound recordings, specifications, spreadsheets, statements, statistics, studies, submittals, summaries, surveys, tags, telefaxes, telegrams, telephone messages, telephone records, teletypes, test reports, text messages, texts, tickets, timesheets, transcripts, transcripts of conversations, transmittals, travel records, video recordings, vouchers, webpages, wire transfers, word processing documents, working papers, worksheets, and all drafts, alterations, modifications, changes and amendments of any kind to the foregoing. This definition includes all documents for which privilege is claimed subject to Instructions above. This definition includes all information or data that is generated, received, processed, and recorded by computers and other electronic devices such as personal digital

assistants and hand-held wireless devices, including associated metadata (*e.g.*, author, recipient, file creation date, file modification date, file path, etc.) regardless of whether such information or data exists in an active file, an archived file, a deleted file or file fragment and regardless of whether such information or data is stored on computer memory, hard drive, removable drive, external hard drive, hard disk, floppy disk, CD-ROM, DVD, magnetic tape, microfiche, or any other media for digital data storage or transmittal.

19. “File” means any collection or group of documents maintained, held, stored, or used together, including, without limitation, all collections of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.

20. “Person” means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all predecessors or successors in interest.

21. “Relating to” and “relates to” means, without limitation, embodying, mentioning, or concerning, directly or indirectly, the subject matter identified in the interrogatory.

22. “Concerning” means, in whole or in part, directly or indirectly, referring to relating to, connected with, commenting on, responding to, showing, describing, analyzing, reflecting and constituting.

23. “Communication” means any oral or written communication of which Mobilize has knowledge, information or belief.

24. “Date” means the exact date, month and year, if ascertainable, or, if not, the best available approximation.

25. The word “and” means “and/or.”

26. The word “or” means “or/and.”

**STEVEN LEE HAYES' FIRST REQUESTS FOR PRODUCTION
TO MOBLIZE**

REQUEST FOR PRODUCTION NO. 1: Documents and Communications Moblize reviewed or relied upon to answer each of the Interrogatories.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Documents and Communications that Moblize contends is confidential information or trade secrets which Mr. Hayes or Mr. Gupte misappropriated, as alleged Paragraph 112–123 of the Statement of Claims.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Documents sufficient to identify the measures Moblize took to maintain the secrecy of the alleged trade secrets or confidential information identified in response to Request for Production No. 2.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Besides Mr. Hayes and Mr. Gupte, the Documents and Communications regarding any individual's or entity's unauthorized access, possession, or use of Moblize's alleged trade secrets or confidential information.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Documents and Communications reflecting any investigation Moblize conducted regarding the alleged misappropriation of trade secrets or confidential information by Mr. Hayes or Mr. Gupte.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Documents and Communications sufficient to calculate the specific damages Moblize allegedly incurred from Mr. Gupte's or Mr. Hayes' alleged violations of the Defend Trade Secrets Act, violations of the Texas Uniform Trade Secrets Act, and unfair competition, as alleged in Paragraphs 114–164 of the Statement of Claims.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: Documents and Communications reflecting or relating to public disclosures by Moblize about the ProINSIGHT application.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: Documents relating to the specific job duties and responsibilities of Mr. Gupte and Mr. Hayes during their employment with Moblize.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: Documents reflecting the content of the “Planning Features Document” referenced in paragraphs 115–121 of the Statement of Claims, including Documents and Communications reflecting discussions about what information to include or exclude.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: Documents evidencing each instance where Moblize provided the “Planning Features Document” or substantially similar information to a third party, excluding Moblize’s attorneys, from July 1, 2018

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: To the extent Moblize seeks lost profits and lost market share, as alleged in Moblize’s Statement Regarding Damages, dated February 19, 2024, produce Moblize’s financial statements, balance sheets, and Documents evidencing Moblize’s lost market share of the products referenced by the Statement of Claims.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: To the extent Moblize seeks lost costs incurred in developing and protecting its confidential information and trade secrets, as alleged in Moblize’s Statement Regarding Damages, dated February 19, 2024, produce the Documents Moblize relied upon to calculate those costs.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: The personnel files for Mr. Hayes and Mr. Gupte.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: The agreements between Moblize and its customers or other third-parties, excluding Moblize's attorneys, concerning the disclosure of Moblize's trade secrets or confidential information at issue in this arbitration.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: To the extent Moblize contends that Mr. Hayes' or Mr. Gupte's conduct caused "the tortious interference with [Moblize's] existing and future contractual relationships, as alleged in Claimant's Statement of Damages dated February 19, 2024, produce the Documents and Communications Moblize intends to use at the arbitration to show that Mr. Hayes' or Mr. Gupte's conduct caused the tortious interference.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: With respect to Request for Production No. 15, produce the Documents and Communications Moblize intends to rely upon to calculate any economic damages from the purported tortious interference with Moblize's existing and future contractual relationships.

RESPONSE:

**STEVEN LEE HAYES' FIRST SET OF INTERROGATORIES
TO MOBLIZE**

INTERROGATRY NO. 1: For each Document or item of information that Moblize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, describe with particularity the specific information claimed to be a trade secret or confidential.

ANSWER:

INTERROGATRY NO. 2: For each Document or item of information that Moblize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, state with particularity when and how Moblize developed the information.

ANSWER:

INTERROGATRY NO. 3: For each Document or item of information that Moblize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, identify the Person(s) that developed the information.

ANSWER:

INTERROGATRY NO. 4: For each Document or item of information that Moblize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, state with particularity the specific measures Moblize took to maintain its secrecy.

ANSWER:

INTERROGATRY NO. 5: For each Document or item of information that Moblize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, specify the numeric or intrinsic value of the information.

ANSWER:

INTERROGATRY NO. 6: With respect to Moblize's answer to Interrogatory No. 5, describe with particularity the method of calculating each category of damages.

ANSWER:

INTERROGATRY NO. 7: For each Document or item of information that Mobilize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, state with particularity how and when Mr. Hayes or Mr. Gupte allegedly misappropriated the information.

ANSWER:

INTERROGATRY NO. 8: For each Document or item of information that Mobilize contends constitutes trade secrets or confidential information that Mr. Hayes or Mr. Gupte misappropriated, identify all Person(s) who had access to this information.

ANSWER:

INTERROGATRY NO. 9: For each cause of action alleged in the Statement of Claims, state the actual damages Mobilize contends it has suffered.

ANSWER:

INTERROGATRY NO. 10: Describe with particularity the factual bases for Mobilize contention that Corva's Anonymous Insights applications was developed using Mobilize's trade secrets or confidential information.

ANSWER:

INTERROGATRY NO. 11: Describe with particularity each step Mobilize took to investigate the alleged misappropriation of trade secrets or confidential information by Mr. Hayes and Mr. Gupte by describing, when the investigation began, each Person(s) who conducted the investigation, what methods were used, and the findings of the investigation.

ANSWER:

INTERROGATRY NO. 12: Identify the Documents and Communications that Mobilize contends Mr. Hayes wrongfully retained after his employment with Mobilize ended.

ANSWER:

INTERROGATRY NO. 13: Describe with particularity the development of Mobilize's ProINSIGHT application by describing, when development began, each Person(s) involved in its development, the sources of information or technology used in development, when the product was first offered to customers, and how Mobilize marketed the product.

ANSWER:

INTERROGATRY NO. 14: Identify each agreement between Mobilize and Person(s) authorized to use Mobilize's confidential information or trade secrets at issue in this arbitration by describing the parties to each agreement and the date(s) each agreement was entered into.

ANSWER:

INTERROGATRY NO. 15: Identify each Mobilize employee that Mobilize contends that Mr. Hayes or Mr. Gupte are attempting to poach, as alleged in Paragraph 122 of the Statement of Claims by stating their name, job title, job duties, and employment dates.

ANSWER:

INTERROGATRY NO. 16: To the extent that Mobilize contends that Mr. Hayes or Mr. Gupte tortiously interfered with Mobilize's existing and future contractual relationships, as alleged in Claimant's Statement of Damages dated February 19, 2024, describe the existing and future contractual relationships by listing the parties to each existing or future contract, the date(s) of each contract, and the monetary value Mobilize contends that Mobilize lost as a result of Mr. Hayes' or Mr. Gupte's conduct.

ANSWER:

AMERICAN ARBITRATION ASSOCIATION

AKM ENTERPRISES INC d/b/a MOBLIZE,
Claimant,

v.

STEVEN LEE HAYES, JR.; AND
 SAMARTH GUPTE,
Respondents.

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Case No. 01-24-0000-8025

**RESPONDENT SAMARTH GUPTE'S FIRST REQUESTS FOR
 PRODUCTION AND INTERROGATORIES TO CLAIMANT AKM
 ENTERPRISES INC. D/B/A MOBLIZE**

To: Claimant AKM Enterprises Inc. d/b/a Moblize, through its attorney of record,
 Jaclyn I. Barbosa, Attorney at Law, PLLC, 2339 Commerce Street, Suite
 102, Houston, Texas 77002.

Respondent Samarth Gupte serves his First Request for Production and First Set of
 Interrogatories to Claimant AKM Enterprises Inc. D/B/A Moblize.

If, in response to any requests, there are any documents requested which are not
 produced because such documents have been destroyed, Claimant is requested to note the
 failure to produce, and to state when and under what circumstances such document was
 destroyed.

Respectfully submitted,

JOHNSON DELUCA KURISKY & GOULD, PC

By: /s/ Bradley L. DeLuca
 Bradley L. DeLuca
 Texas State Bar No.: 0563800

EXHIBIT B

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Omid Abaei

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4 Houston Center

1221 Lamar Suite 1000

Houston, Texas 77010

Telephone: (713) 652-2525

Facsimile: (713) 652-5130

**ATTORNEYS FOR RESPONDENT
SAMARTH GUPTE**

CERTIFICATE OF SERVICE

I hereby certify that, on the 28th day of April 2025, a true and correct copy of the above document was forwarded to all parties of record via Certified Mail, Electronic Mail, Facsimile, Regular Mail and/or Hand Delivery:

VIA E-SERVICE

Jaclyn I. Barbosa

ATTORNEY AT LAW

2339 Commerce Street, Suite 102

Houston, Texas 77002

jaclyn@jbarbosalaw.com

Attorney for Claimant

AKM Enterprise, Inc. d/b/a Moblize

VIA E-SERVICE

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1885 St. James Place, 15th Floor

Houston, Texas 77056

Attorneys for Respondent Steven Hayes

/s/ Bradley L. DeLuca

Bradley L. DeLuca

I.**INSTRUCTIONS FOR INTERROGATORIES**

1. Claimant is required to answer these discovery requests and submit full and complete responses within (30) days of service thereof.

2. Claimant's responses shall state, with respect to each item or category, a full and complete answer to the Interrogatory proffered, unless the Interrogatory is objected to, in which event the legal basis and reasons for the objection shall be clearly stated. If objection is made to part of any item or category, the part shall be specified, and Claimant shall be required to fully respond to the remaining part of the item or category to which no objection was stated.

3. In accordance with Fed. R. Civ. P. 33, Interrogatories which cannot be answered in full should be answered as completely as possible. Incomplete answers should be accompanied by a specific explanation for the incompleteness of the answer, as well as by a statement of whatever knowledge, information, or belief possessed in respect to each unanswered or incompletely answered Interrogatory.

4. The party submitting these requests may move for an order under Fed. R. Civ. P. 37 with respect to any objection to or other failure to respond to any Interrogatory or any part thereof that fails to comply with the requirements of the Federal Rules of Civil Procedure.

5. Claimant's failure to timely respond to these Interrogatories constitutes a waiver of any objections under Federal law. A request by Claimant for additional time after said responses are due is insufficient to remedy such waiver. Pursuant to the obligations stated under the Federal Rules of Civil Procedure additional time may be granted depending on the factual circumstances, however, all objections will be deemed waived and full and complete responses to each Interrogatory is required.

6. These Interrogatories shall be deemed continuing pursuant to the provisions of Fed. R. Civ. P. 26(e) and requires the supplementation of responses if information is obtained and/or acquired between the time of responses to these Interrogatories and the time of any other deadline for disclosure or trial as required by the Court. Such supplementary responses shall be served and made seasonably, but not later than thirty (30) days after such additional information is obtained and/or acquired. Failure to timely provide supplemental responses is grounds for this Respondent to seek Court intervention to alleviate the prejudice such failures may have imposed on the Respondent.

7. When an Interrogatory asks you to state the basis of a particular claim, contention, or allegation, state in your answer all facts and evidence to support the contention, the identify of each person who has knowledge of those facts and evidence, identify all documents to support the contention, and state each and every legal theory that you think supports, refers to, or evidences such claim, contention, or allegation.

8. Each of the Interrogatories hereinafter set forth not only calls for the knowledge of the party answering said Interrogatories, but also their agents and employees, and all information and knowledge that is available to said parties' representatives and attorneys not otherwise protected by a legally recognized privilege.

9. If any Interrogatory cannot be answered on personal knowledge, please so state an answer the same by whatever evidence is available, identifying the source of such information, and including the name, address, phone number, and email address of each person consulted. If said party answering these Interrogatories is without personal knowledge as to any such Interrogatory, have the same answered by all persons whom said party will call as a witness to testify as to the fact or information upon the trial of this cause.

10. These Interrogatories also call for any hearsay information which may have been heard by any officer, director, agent, representative, servant, employee, accountant, or attorney of Claimant or if such hearsay information is given with the answers to any Interrogatory, the Interrogatory shall be deemed to include a request that you identify the source of such hearsay information to the best of your knowledge and belief.

11. In the event any answer called for is withheld on the basis of a claim of privilege, the privilege must be clearly stated and all information required Federal law and Fed. R. Civ. P. 26(B)(5) is to be provided, including but not limited to the presentation of a privilege log.

12. As to any document of which identification is requested herein, which is not presently in your possession or subject to your control, identify each person to whom you believe had and/or has knowledge of its location or a copy thereof, and identify each person to whom you believe had and/or has knowledge of its contents.

13. As to those Interrogatories consisting of a number of separate subdivisions or related parts or portions, a complete response is required to each such part or portion with the same effect as if it were propounded as a separate interrogatory.

14. Unless otherwise stated herein, these Interrogatories and Requests for Production shall cover the time period from five years prior to your filing of this Lawsuit, through the date of your responses to said requests, including documents prepared, dated, or received during said time period.

INSTRUCTIONS FOR DISCOVERY REQUESTS

1. If any items responsive to any request are known by you to exist but are not in your possession or the possession of your agents, Respondent requests that you so indicate and produce items that show the name of the person or entity in whose custody such items reside. If any items responsive to any request have been lost, mutilated, or destroyed, so state and identify each such document, the time, and circumstances under which same occurred, and state to which request(s) the document would have been responsive.
2. If any Request herein cannot be complied with in full, it shall be complied with to the extent possible with an explanation as to why full compliance is not possible. For example, if responsive electronic files cannot be produced because of technical issues with the files (e.g., corrupted files, password protected files, etc.), you are instructed to identify such electronic files to that the parties can discuss appropriate steps to produce those files or otherwise make them accessible.
3. If there are no items in your possession, custody, or control which are responsive to a particular request, so state and identify such request.
4. You must also supplement your responses to include information acquired at a later date if you obtain information upon the basis of which: (i) you know that your response was incorrect or incomplete when made, or (ii) you knew that, although your response was correct and complete when made, the response is no longer true and complete and the circumstances are such that failure to amend the response is in substance misleading.
5. Unless otherwise specified, the relevant time period for the Requests for Production and Interrogatories are from January 1, 2018 to the present.

II.

GENERAL TERMS AND DEFINITIONS

In responding to these requests, the following definitions and instructions shall apply unless otherwise indicated:

1. The terms “You”, “Your”, or “Claimant” means and includes Claimant AKM Enterprises d/b/a Moblize and/or its agent(s), employee(s), representative(s), predecessor(s), assign(s) and/or attorney(s).
2. “Identify” a natural person means to state the full name, home and business addresses and telephone numbers, employer and job position at the present time and at the time to which the interrogatory relates, and whether the person is ill, disabled, incompetent, or deceased.
3. “Identify” when used in reference to a document means to state the date and author, type of document, *e.g.*, letter, memorandum, telegram, chart, etc. (or some other means of identifying it) and its present location or custodian. If any such document was, but is no longer, in your possession or subject to your control, state what disposition was made of it. “Summarize” used in reference to a document means to state the information contained in the document, including all recommendations and conclusions, in summary form.
4. “Communication” or “communications” shall include but is not limited to any telephone conversation, meeting, discussion, letter, facsimile, email, electronic text message, telex, telegram, or other physical or electronic means in which information was received or transmitted to or from you, including all such materials for which you were not a direct recipient (*i.e.*, a “cc” or carbon copy.)
5. “Relate to” and “relates to” shall mean discusses, describes, explains, embodies, comprises, concerns or pertains to that subject or thing and shall include the subject or thing itself. Likewise, the terms “evidencing,” “refer to” and “referring to” mean discussing, describing, explaining, embodying, comprising, concerning or pertaining to in any way and shall include the subject or thing itself.
6. “State the factual basis” or any derivative thereof means to describe in detail all facts discoverable under the Federal Rules of Civil Procedure. A question calling for the factual basis for a claim or contention should be answered with as much particularity as possible, describing in detail all factors considered, all factors upon which the statement was based. All factors which were rejected as a basis for the statement, which person participating, and the date or dates involved.

7. "Trade Secrets and Confidential Information" means the processes, methods and compilations referred to in your live complaint and made the basis of Mobilize's claims of misappropriation in this Lawsuit.
8. "Documents" shall mean all writings and recordings of any kind, which are in your possession, custody or control, including the original and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise. This includes all data or data compilations stored in any medium from which information can be obtained, including all electronically stored information. "Documents" shall include, without limitation, acceptances, accounts, advertisements, agreements, analyses, applications, appointment books, approvals, assignments, audio recordings, bids, bonds, bookkeeping records, booklets, books, brochures, bulletins, calculations, calendars, call reports, catalogs, certificates for payment, charts, checks, circulars, computer printouts, contracts, correspondence, daily logs, data processing cards, data processing tapes, data sheets, databases, delivery tickets, diaries, drafts, drawings, email and attachments, engineering reports, estimates, expert reports, financial instructions, financial records, financial statements, financing documents, graphs, indices, inspection reports, instant messages, instructions, interoffice and/or intraoffice communications, invoices, journals, labels, leases, ledgers, letters, licenses, lists, logs, manifests, manuals, meeting minutes, memoranda, notations, notebooks, notes, notes or memoranda of understanding, notices, offers, outlines, pamphlets, pay stubs, payment applications, payments, periodicals, permits, photographs, photographic records, plans, publications, purchase orders, receipts, recordings, releases, reports, requests for proposal, returns, schedules, sketches, sound recordings, specifications, spreadsheets, statements, statistics, studies, submittals, summaries, surveys, tags, telefaxes, telegrams, telephone messages, telephone records, teletypes, test reports, text messages, texts, tickets, timesheets, transcripts, transcripts of conversations, transmittals, travel records, video recordings, vouchers, webpages, wire transfers, word processing documents, working papers, worksheets, and all drafts, alterations, modifications, changes and amendments of any kind to the foregoing. This definition includes all documents for which privilege is claimed subject to Instructions above. This definition includes all information or data that is generated, received, processed, and recorded by computers and other electronic devices such as personal digital assistants and hand-held wireless devices, including associated metadata (e.g., author, recipient, file creation date, file modification date, file path, etc.) regardless of whether such information or data exists in an active file, an archived file, a deleted file or file fragment and regardless of whether such information or data is stored on computer memory, hard drive, removable drive, external hard drive, hard disk, floppy disk, CD-ROM, DVD, magnetic tape, microfiche, or any other media for digital data storage or transmittal.

SAMARTH GUPTA'S FIRST SET OF INTERROGATORIES**INTERROGATORY NO. 1:**

Identify with specificity each "proprietary data quality procedure and algorithm" that Samarth Gupte allegedly misappropriated, including:

- a. When and how each was developed by Moblize
- b. How each qualifies as a trade secret
- c. The specific measures taken to protect each as confidential

ANSWER:**INTERROGATORY NO. 2:**

For each alleged trade secret identified in your response to Interrogatory 1, state with particularity the factual basis for Moblize's contention that Samarth Gupte used or disclosed that specific trade secret after his employment ended, including the approximate date(s) of such alleged use or disclosure and the specific manner in which such alleged use or disclosure occurred.

ANSWER:**INTERROGATORY NO. 3:**

Identify all features in Corva's Fusion product that Moblize alleges incorporate or were derived from Moblize's trade secrets or confidential information, detailing the specific similarities and alleged connection to Samarth Gupte.

ANSWER:**INTERROGATORY NO. 4:**

Describe with specificity the "ProINSIGHT functionality" referenced in your allegations, including when it was developed, its technical specifications, and precisely what aspects constitute trade secrets.

ANSWER:

INTERROGATORY NO. 5:

Identify all "early-adopter customer meetings" that Samarth Gupte attended regarding ProINSIGHT, including dates, attendees, and specific confidential information disclosed.

ANSWER:

INTERROGATORY NO. 6:

Describe the specific training Gupte received on Moblize's data quality analytics and management tools, including basic drilling principals, Moblize's ProACT application, WITSML standard, well data quality controls, well data monitoring, well data quality control issue resolution, and Moblize's technical design. Include who provided the training, when it occurred, and how this training differed from industry-standard knowledge.

ANSWER:

INTERROGATORY NO. 7:

Identify when Moblize first became aware of Corva's Fusion product, how Moblize determined Samarth Gupte worked on this product, and what specific steps Moblize took upon discovering this information.

ANSWER:

INTERROGATORY NO. 8:

Explain how the "anonymous competitor benchmarking" referenced in your allegations qualifies as a trade secret, including the specific unique methods or compilations that differentiate it from industry-standard benchmarking practices.

ANSWER:

INTERROGATORY NO. 9:

Identify all publicly available information, including industry standards, academic literature, patents, or conference presentations that disclose elements of what Moblize claims as its proprietary data quality procedures and algorithms.

ANSWER:

INTERROGATORY NO. 10:

Identify all specific economic damages Moblize claims to have suffered as a direct result of Samarth Gupte's alleged misappropriation, including calculations, methodologies, and supporting evidence.

ANSWER:

INTERROGATORY NO. 11:

Describe with specificity what role, if any, Samarth Gupte played in the development, implementation, testing, marketing, or use of Moblize's ProACT Planning Connector technology, including the dates of any such involvement, the specific tasks he performed, and a detailed description of what confidential aspects of this technology Moblize alleges Samarth Gupte misappropriated.

ANSWER:

INTERROGATORY NO. 12:

Describe with specificity what role, if any, Samarth Gupte played in the development, implementation, testing, marketing, or use of Moblize's ProACT Authorization for Expenditure Predictor, including the dates of any such involvement, the specific tasks he performed, and a detailed description of what confidential aspects of this technology Moblize alleges Samarth Gupte misappropriated.

ANSWER:

INTERROGATORY NO. 13:

Describe with specificity what role, if any, Samarth Gupte played in the development, implementation, testing, marketing, or use of Moblize's ProACT Real-Time

Torque and Drag, including the dates of any such involvement, the specific tasks he performed, and a detailed description of what confidential aspects of this technology Mobilize alleges Samarth Gupte misappropriated.

ANSWER:

INTERROGATORY NO. 14:

Identify with specificity what aspects of Mobilize's "Business Lists and Sales Methodology," including its client lists, contact information, and "E3 Methodology," Mobilize alleges Samarth Gupte and Steven Hayes misappropriated, including when and how such alleged misappropriation occurred.

ANSWER:

INTERROGATORY NO. 15:

Describe all measures Mobilize implemented to protect the confidentiality of its "Business Lists and Sales Methodology," including its "E3 Methodology," during Gupte's employment.

ANSWER:

INTERROGATORY NO. 16:

Identify each specific instance in which Mobilize alleges Samarth Gupte used or disclosed any of Mobilize's claimed trade secrets after his employment ended, stating for each instance the date of the alleged use or disclosure, the specific trade secret allegedly used or disclosed, the manner in which it was allegedly used or disclosed, and all persons with knowledge of such alleged use or disclosure.

ANSWER:

INTERROGATORY NO. 17:

Identify all specific economic damages Mobilize claims to have suffered as a direct result of Samarth Gupte's alleged breach of contract, including calculations, methodologies, and supporting evidence.

ANSWER:

**SAMARTH GUPTE'S FIRST REQUESTS FOR PRODUCTION
TO MOBLIZE**

REQUEST FOR PRODUCTION NO. 1: All Documents and Communications Moblize reviewed or relied upon to answer each of the Interrogatories.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: All versions of ProINSIGHT software or documentation that existed during Samarth Gupte's employment, including user manuals, technical specifications, and source code.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: All documents reflecting the development history of ProINSIGHT, including planning documents, specifications, and release notes from 2018-2020.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: All confidentiality agreements, NDAs, or similar documents signed by Samarth Gupte relating to the specific trade secrets and confidential information allegedly misappropriated.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All training materials provided to Samarth Gupte regarding the specific proprietary data quality procedures and algorithms referenced in your allegations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All documents showing specific measures Moblize took to protect the confidentiality of the information Samarth Gupte allegedly misappropriated.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: All documents, including communications, related to the "early-adopter customer meetings" that Samarth Gupte allegedly attended regarding ProINSIGHT.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: All documents reflecting Moblize's product roadmap that was allegedly exposed to Samarth Gupte during his employment.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: Copies of any publicly available information, including patents, publications, or marketing materials, that disclose any aspects of the alleged trade secrets.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: All documents related to Samarth Gupte's termination, including performance reviews, disciplinary actions, and exit interviews.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: All documents and communications reflecting Moblize's knowledge of Samarth Gupte's employment at Corva, including when and how Moblize became aware.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: All documents comparing Moblize's proprietary data quality procedures and algorithms with industry-standard practices.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: All documents establishing the economic value of the specific trade secrets Samarth Gupte allegedly misappropriated.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: Produce all documents relating to the development, protection, and use of Moblize's claimed proprietary "E3 Methodology" from 2018 to present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: Produce all client lists, prospect lists, or contact information that Moblize alleges Samarth Gupte and Steven Hayes had access to and subsequently misappropriated.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: Produce any evidence demonstrating Samarth Gupte's alleged use or disclosure of Moblize's business lists or "E3 Methodology" after his employment ended.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17: Produce any evidence demonstrating Samarth Gupte's alleged use or disclosure of Moblize's Trade Secrets.

RESPONSE:

From: [Colleen McKnight](#)
To: [Omid Abaei](#); [Randee Rogers](#); [Bradley L. Deluca](#); [Sarah R. Chivleatto](#)
Cc: [Jaclyn Barbosa](#); [Tara Dennis](#)
Subject: RE: AKM / Amended Discovery and Document Production
Date: Tuesday, July 8, 2025 11:43:27 AM

Omid,

I agree that the current arrangement and time crunch Jaclyn and I stepped into creates unnecessary costs.

Please let us know if Defendants are willing to grant an extension to allow a more cost-efficient process.

--

Colleen McKnight
Founding Partner
McKnight Law PLLC
972.310.9303

From: Omid Abaei <oabaei@jdkglaw.com>
Sent: Tuesday, July 8, 2025 11:39 AM
To: Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Randee Rogers <randee@jbarbosalaw.com>; Bradley L. Deluca <bdeluca@jdkglaw.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>
Cc: Jaclyn Barbosa <jaclyn@jbarbosalaw.com>; Tara Dennis <tara@jbarbosalaw.com>
Subject: RE: AKM / Amended Discovery and Document Production

We appreciate the explanation, but Moblize's approach to discovery remains deeply problematic. This is unnecessarily costly, for both sides.

Sincerely,

Omid Abaei
Associate Attorney



4 Houston Center
1221 Lamar Street, Suite 1000
Houston, Texas 77010
Telephone: 713-652-2525
Direct Office: 713-658-3343
Facsimile: 713-652-5130

EXHIBIT E

Email: oabaei@jdkglaw.com

From: Colleen McKnight <colleen.mcknight@mcknightlaw.us>

Sent: Tuesday, July 8, 2025 11:25 AM

To: Omid Abaei <oabaei@jdkglaw.com>; Randee Rogers <randee@jbarboslaw.com>; Bradley L. Deluca <bdeluca@jdkglaw.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>

Cc: Jaclyn Barbosa <jaclyn@jbarboslaw.com>; Tara Dennis <tara@jbarboslaw.com>

Subject: RE: AKM / Amended Discovery and Document Production

Hi Omid,

Our purpose was twofold:

1. The production was too large and produced too late for us to have an opportunity to fully review the documents. Thus, as it was produced to us, we produced it back.
2. We wanted to be sure that we could use the documents in the production for our dispositive motions and at trial. As you know, the Rules allow a party to use the documents it produces with notice, which has been provided here. We anticipate the Hayes production contains many key and helpful documents for our client's claims, but we have not had the time from its production to review it all. Again, we would have loved to make it more tailored but give the time constraints and the volume of the production, we made the best call that we could.

As you know, we are working diligently to get this case back on track now that we have been retained. We've requested additional time from the Defendants for that purpose, and you've refused. While we wait on the Court's ruling on our request, we are doing our best to comply with the rules, the deadlines, and preserve our client's rights and ability to present its case.

If Defendants are willing to reconsider their position on the deadlines in the case, we are willing to revisit the Hayes production with the additional time we will get to narrow the production to what we can determine is relevant.

Thanks so much.

--

Colleen McKnight
Founding Partner
McKnight Law PLLC
972.310.9303

From: Omid Abaei <oabaei@jdkglaw.com>
Sent: Tuesday, July 8, 2025 11:06 AM
To: Randee Rogers <randee@jbarboslaw.com>; Bradley L. Deluca <bdeluca@jdkglaw.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>
Cc: Jaclyn Barbosa <jaclyn@jbarboslaw.com>; Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Tara Dennis <tara@jbarboslaw.com>
Subject: RE: AKM / Amended Discovery and Document Production

Why did your side produce all of these documents? What purpose does it serve to have hundreds of thousands of Steven Hayes's personal files, including music files, in the record?

Sincerely,

Omid Abaei
Associate Attorney



4 Houston Center
1221 Lamar Street, Suite 1000
Houston, Texas 77010
Telephone: 713-652-2525
Direct Office: 713-658-3343
Facsimile: 713-652-5130
Email: oabaei@jdkglaw.com

From: Randee Rogers <randee@jbarboslaw.com>
Sent: Tuesday, July 8, 2025 11:04 AM
To: Omid Abaei <oabaei@jdkglaw.com>; Bradley L. Deluca <bdeluca@jdkglaw.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>
Cc: Jaclyn Barbosa <jaclyn@jbarboslaw.com>; Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Tara Dennis <tara@jbarboslaw.com>; Randee Rogers <randee@jbarboslaw.com>
Subject: Re: AKM / Amended Discovery and Document Production

Thanks for reaching out, Omid. All production from us with a MOBLIZE Bates prefix is intended for both the arbitration and federal matters.

Randee Rogers, Senior Paralegal
Jaclyn I. Barbosa, Attorney at Law, PLLC

2339 Commerce Street, Suite 102
Houston, TX 77002
Phone: (832) 696-8050
Email: Randee@jbarbosalaw.com

This message is intended only for the use of the individual to whom it is addressed and contains information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any unauthorized disclosure, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone and destroy all copies of the message.

From: Omid Abaei <oabaei@jdkglaw.com>
Sent: Tuesday, July 8, 2025 10:56 AM
To: Randee Rogers <randee@jbarbosalaw.com>; Bradley L. Deluca <bdeluca@jdkglaw.com>; Tony Stergio <astergio@andrewsmyers.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>; ABroadly@andrewsmyers.com <abroadly@andrewsmyers.com>; Jasmine Nash <jnash@andrewsmyers.com>; Elliot Kudisch <ekudisch@andrewsmyers.com>
Cc: Jaclyn Barbosa <jaclyn@jbarbosalaw.com>; Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Tara Dennis <tara@jbarbosalaw.com>
Subject: RE: AKM / Amended Discovery and Document Production

Jaclyn/Colleen,

Is this production supposed to be for both the federal court case and the arbitration?

Sincerely,

Omid Abaei
Associate Attorney



4 Houston Center
1221 Lamar Street, Suite 1000
Houston, Texas 77010
Telephone: 713-652-2525
Direct Office: 713-658-3343
Facsimile: 713-652-5130
Email: oabaei@jdkglaw.com

From: Randee Rogers <randee@jbarbosalaw.com>
Sent: Tuesday, July 8, 2025 7:26 AM

To: Bradley L. Deluca <bdeluca@jdkglaw.com>; Tony Stergio <astergio@andrewsmyers.com>; Sarah R. Chivleatto <SChivleatto@jdkglaw.com>; ABroadly@andrewsmyers.com; Jasmine Nash <jnash@andrewsmyers.com>; Elliot Kudisch <ekudisch@andrewsmyers.com>; Omid Abaei <oabaei@jdkglaw.com>

Cc: Jaclyn Barbosa <jaclyn@jbarboslaw.com>; Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Randee Rogers <randee@jbarboslaw.com>; Tara Dennis <tara@jbarboslaw.com>

Subject: AKM / Amended Discovery and Document Production

Dear Counsel:

Please use the following link to access a Word document containing links to AKM's supplemental document production, Bates labeled MOBLIZE0548015-MOBLIZE0780549 and MOBLIZE220166-MOBLIZE2204255: [MOBLIZE0548015-MOBLIZE2204255.docx](#). The password to access the documents will follow under separate cover. As Jaclyn mentioned, the production MOBLIZE0780550-MOBLIZE2201165 is still running; as soon as it is complete, we will update the Word document with the link to access same and let you know.

In addition, I have attached the following items for your review and file:

1. Claimant AKM's Amended Objections and Responses to Respondent Samarth Gupte's First Requests for Production and Interrogatories;
2. Claimant's Amended Objections and Responses to Respondent Steven Lee Hayes, Jr.'s First Requests for Production and Interrogatories to Claimant AKM Enterprises Inc. d/b/a Moblize;
3. AKM's Amended Objections and Responses to Respondent Steven Lee Hayes, Jr.'s Second Requests for Production to Claimant AKM Enterprises Inc. d/b/a Moblize; and
4. a spreadsheet distinguishing which documents Moblize produced are original productions as opposed to documents already produced by Steven Hayes.

Later this morning, we will send over signed copies of the following:

1. Verification of Amit Mehta in support of Claimant AKM's Amended Objections and Responses to Respondent Samarth Gupte's Interrogatories; and
2. Verification of Amit Mehta in support of Claimant's Amended Objections and Responses to Respondent Steven Lee Hayes, Jr.'s First Interrogatories.

Please let me know if you have any questions.

Thank you,

Randee

Randee Rogers, Senior Paralegal
Jaclyn I. Barbosa, Attorney at Law, PLLC

2339 Commerce Street, Suite 102

Houston, TX 77002

Phone: (832) 696-8050

Email: Randee@jbarbosalaw.com

This message is intended only for the use of the individual to whom it is addressed and contains information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any unauthorized disclosure, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by telephone and destroy all copies of the message.

From: [Omid Abaei](#)
To: [Jaclyn Barbosa](#); [Randee Rogers](#)
Cc: [Colleen McKnight](#); [Bradley L. Deluca](#); [Millard A. Johnson](#); [Sarah R. Chivleatto](#); [Tony Stergio](#); [Elliot Kudisch](#); [Rahul Rao](#); [Jasmine Nash](#); [Assistant](#); [Sarah Wood](#)
Subject: Moblize Arbitration - Meet and Confer Follow-up
Date: Wednesday, July 9, 2025 6:42:00 PM

Hello Jaclyn,

It was good talking with you over Teams. I wanted to follow up to confirm my understanding of several points we discussed:

1. You stated that your experts (I assume Greg Crouse and Corey Gildart) have reviewed Corva code they found on GitHub. Please provide the link to the repository they reviewed.
2. You also mentioned that these experts located Corva's customer demos and v2.1 release notes on GitHub. Please provide the links or sources for those materials as well.
3. You indicated that your team identified "internal Corva design specifications" from the "Corva Research" document located on Steven Hayes's hard drive. Please produce the document(s) or provide the Bates numbers for the materials containing those specifications.
4. Regarding end-user reports from beta testing, you mentioned they came from either GitHub or a Corva application or website. Please clarify the exact source.
5. Finally, you referred to an email from Corva that was maybe accidentally sent to Moblize and related to technical issues. Please provide a copy of that email.

Additionally, I want to confirm our agreement on two points from the call. Please let me know if I've misunderstood.

1. The next set of amended discovery responses will be the final version, absent newly discovered information. This is to ensure the parties can rely on the responses and avoid unnecessary revisions, since the discovery responses produced two days ago were not completely accurate or approved by Mr. Mehta.
2. The forthcoming responses will not include any references to expert opinions or summaries unless and until the Arbitrator permits expert designations or reports.

EXHIBIT G

Please confirm or clarify as needed.

Sincerely,

Omid Abaei

Associate Attorney



4 Houston Center

1221 Lamar Street, Suite 1000

Houston, Texas 77010

Telephone: 713-652-2525

Direct Office: 713-658-3343

Facsimile: 713-652-5130

Email: oabaei@jdkglaw.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AKM ENTERPRISE, INC.,

Plaintiff,

v.

CORVA AI, LLC, ET AL,

Defendant.

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Civil Action No. 4:23-CV-4144

NOTICE OF SUBPOENA

Pursuant to Federal Rule of Civil Procedure 45, notice is hereby provided that Plaintiff AKM Enterprise, Inc. d/b/a Moblize, by and through undersigned counsel, will serve a subpoena on Steven Lee Hayes, Jr. to produce documents, information, or tangible objects, a true and correct copy of which is attached.

Dated: March 4, 2025,

MCDOWELL HETHERINGTON LLP

/s/ Jay M. Patterson

Thomas F.A. Hetherington

(Attorney-in-charge)

Texas State Bar No. 24007359

tom.hetherington@mhllp.com

Kendall J. Burr

State Bar No. 24067533

kendall.burr@mhllp.com

Jay M. Patterson

State Bar No. 24113434
jay.patterson@mhllp.com
1001 Fannin Street, Suite 2400
Houston, Texas 77002
Telephone: (713) 337-5580
Facsimile: (713) 337-8850

*ATTORNEYS FOR PLAINTIFF AKM
ENTERPRISES, INC. d/b/a MOBLIZE*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on

March 4, 2025, on all counsel of record via e-mail.

/s/ Jay M. Patterson
Jay M. Patterson

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

AKM ENTERPRISE, INC.

Plaintiff

v.

CORVA AI, LLC et al.

Defendant

Civil Action No. 4:23-cv-4144

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: Steven Lee Hayes, Jr. c/o Elliot J. Kudisch, Andrews Myers, P.C.,
1885 Saint James Place, 15th Floor, Houston, Texas 77056, (713) 850-4200

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit A

Place: McDowell Hetherington, LLP
1001 Fannin, Suite 1400
Houston, TX 77002

Date and Time:

03/18/2025 12:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/04/2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Jay M. Patterson

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiff

AKM Enterprises, Inc. d/b/a Moblize, who issues or requests this subpoena, are:
Jay Patterson, McDowell Hetherington LLP, 1001 Fannin St., Suite 2400, Houston, TX 77002
email: jay.patterson@mhllp.com, telephone: (713) 221-2547

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 4:23-cv-4144

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

1. “You,” “Your” and “Yourself” means Steven L. Hayes and all representatives presently or formerly purporting to act on Your behalf.
2. “Moblize” shall mean AKM Enterprises, Inc. d/b/a Moblize, and its members, agents, officers, employees, or representatives presently or formerly purporting to act on its behalf.
3. “Corva” shall mean Corva AI, LLC, and its members, agents, officers, employees, or representatives presently or formerly purporting to act on its behalf.
4. “Communication” means any transmission of information, including any written communication, such as correspondence, telephone calls, electronic mail or conversations.
5. “Document” or “Documents” means all forms of information within the scope of discovery permitted by Federal Rule of Civil Procedure 34(a), including all documents, things, Communications, and/or electronic materials.
6. “Relating to” or “regarding” means directly or indirectly mentioning or describing, or being connected with, referring to, or reflecting upon a stated subject matter, document, event, or person.
7. The term “any” includes each, every, and all person, places, or things to which the term refers.
8. The terms “and” and “or” are to be construed either conjunctively or disjunctively to bring within the scope of these requests any information that might otherwise be considered to be beyond their scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, to bring within the scope of these requests any

information that might otherwise be considered to be beyond their scope.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: All Documents and/or Communications that were saved to Your devices listed below:

- MacBook Pro
- Sandisk Cruzer Glide 8 GB thumb drive
- Sandisk Cruzer Glide 64 GB thumb drive
- Two PNY 8 GB thumb drives
- USB with Ring
- Kingston traveler 2DB thumb drive
- Seagate portable 2 TB external drive

REQUEST FOR PRODUCTION NO. 2: All Documents and/or Communications comparing, contrasting, or otherwise referring to Moblize's technology and Corva's technology.

REQUEST FOR PRODUCTION NO. 3: All Documents and/or Communications regarding Moblize, including any Documents and/or Communications obtained during your employment with Moblize or at any time after Your departure from Moblize.

REQUEST FOR PRODUCTION NO. 4: All Documents and/or Communications regarding Corva's use, misappropriation, copying, or exploitation of any technology belonging to Moblize or any other competitor.

REQUEST FOR PRODUCTION NO. 5: All Documents and/or Communications relating to any conflict of interest that resulted in Your retention of counsel at Andrews Myers, P.C. in lieu of Your prior counsel at Johnson DeLuca Kurisky & Gould, P.C.

From: [Omid Abaei](#)
To: [Jaclyn Barbosa](#); [Colleen McKnight](#); [Randee Rogers](#)
Cc: [Bradley L. Deluca](#); [Millard A. Johnson](#); [Sarah R. Chivleatto](#); [Derek Franck](#); [Ernest Barbosa](#)
Subject: RE: Mobilize/Corva - Mobilize's breach of the protective order
Date: Wednesday, July 30, 2025 1:57:00 PM

Jaclyn, Colleen,

We need your response on this issue. Corva produced confidential documents under the understanding that they would be treated in accordance with the protective order. Please confirm whether Mr. Mehta was the only unauthorized person to view Corva's confidential production.

Also, please let us know whether any of your experts or other third parties have viewed Corva's confidential documents.

Sincerely,

Omid Abaei
Associate Attorney



4 Houston Center
1221 Lamar Street, Suite 1000
Houston, Texas 77010
Telephone: 713-652-2525
Direct Office: 713-658-3343
Facsimile: 713-652-5130
Email: oabaei@jdkglaw.com

From: Omid Abaei
Sent: Monday, July 28, 2025 6:48 PM
To: Jaclyn Barbosa <jaclyn@jbarbosalaw.com>; Colleen McKnight <colleen.mcknight@mcknightlaw.us>; Randee Rogers <randee@jbarbosalaw.com>
Cc: Bradley L. Deluca <bdeluca@jdkglaw.com>; Millard A. Johnson <mjohnson@jdkglaw.com>; Sarah R. Chivleatto <schivleatto@jdkglaw.com>; Derek Franck <dfanck@jdkglaw.com>; Ernest Barbosa <ernest@jbarbosalaw.com>
Subject: Mobilize/Corva - Mobilize's breach of the protective order

Hello Mobilize team,

It appears that Mobilize violated the Protective Order in this case.

EXHIBIT M

In your response to Corva's Motion for Summary Judgment, you filed the Declaration of Mehta as Exhibit 1. Exhibit C to that Declaration is a Corva document designated "Confidential" under the Protective Order. Mr. Mehta's Declaration references this document and attaches it as an exhibit.

Moblize never sought or obtained permission to disclose Corva's confidential materials to Mr. Mehta. Under the terms of the Protective Order, such disclosure is not permitted.

Please confirm immediately (1) whether Mr. Mehta was in fact shown protected materials, (2) whether Moblize contends this disclosure was proper, and (3) what steps you are taking to prevent any further unauthorized access.

Corva reserves all rights, including the right to seek appropriate relief from the Court.

Sincerely,

Omid Abaei

Associate Attorney



4 Houston Center

1221 Lamar Street, Suite 1000

Houston, Texas 77010

Telephone: 713-652-2525

Direct Office: 713-658-3343

Facsimile: 713-652-5130

Email: oabaei@jdkglaw.com

Matter Ledger Report

5/1/2025 to 7/31/2025

EXHIBIT
N

	Code	Name	Init Atty	BLD	BRADLEY L. DELUCA
Client	24966	CORVA	Bill Atty	BLD	BRADLEY L. DELUCA
Matter	0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

- Unbilled Time

[illegible]

Matter Ledger Report

5/1/2025 to 7/31/2025

Client Matter	Code	Name	Init Atty	BLD	BRADLEY L. DELUCA
	24966	CORVA	Bill Atty	BLD	BRADLEY L. DELUCA
	0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

Unbilled Time Continued

Code	Name	Date	Code	To Be Billed		Task	Ref #	Text
				Hours	\$ Value			
OMA	OMID ABAEI	06/25/25	B	0.10	22.50		4EU3539	Correspondence with B. DeLuca regarding discovery strategy
OMA	OMID ABAEI	06/26/25	B	0.10	22.50		4EV2598	Correspondence regarding preparations for hearing on Motion to Compel
█	█	█	█	█	█		█	█
OMA	OMID ABAEI	06/26/25	B	0.60	135.00		4EV2601	Prepare for hearing on Motion to Compel
OMA	OMID ABAEI	06/27/25	B	0.10	22.50		4EV2602	Correspondence with A. Decker regarding hearing on Motion to Compel
OMA	OMID ABAEI	06/27/25	B	1.60	360.00		4EV2610	Prepare for hearing on Motion to Compel
OMA	OMID ABAEI	06/27/25	B	1.00	225.00		4EV2611	Telephone call with opposing counsel regarding discovery production
OMA	OMID ABAEI	06/27/25	B	0.30	67.50		4EV2616	Attend hearing on Motion to Compel
OMA	OMID ABAEI	06/27/25	B	0.30	67.50		4EV2630	Revise proposed Order on Motion to Compel
OMA	OMID ABAEI	06/27/25	B	0.20	45.00		4EV2631	Review Plaintiff's Privilege Log
OMA	OMID ABAEI	06/27/25	B	0.50	112.50		4EV2632	Correspondence with G. Cormier and B. DeLuca regarding hearing and status of discovery
OMA	OMID ABAEI	06/30/25	B	0.20	45.00		4EU4895	Revise proposed Order on Motion to Compel
OMA	OMID ABAEI	06/30/25	B	0.10	22.50		4EV2637	Review correspondence with J. Barbosa regarding Privilege Log
OMA	OMID ABAEI	06/30/25	B	0.20	45.00		4EV2638	Review new Privilege Log and document production
OMA	OMID ABAEI	07/01/25	B	0.20	45.00		4EW5711	Review correspondence regarding proposed Order on Motion to Compel
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
OMA	OMID ABAEI	07/08/25	B	4.60	1,035.00		4EW5921	Review discovery production and draft emails clarifying discovery issues to opposing counsel
█	█	█	█	█	█		█	█
MAJ	MILLARD A. JOHNSON	07/09/25	B	0.90	360.00		4EV7460	Receive and review email from B. DeLuca; review responses; conference with O. Abaei regarding approach; teleconference with B. DeLuca regarding same
OMA	OMID ABAEI	07/09/25	B	0.60	135.00		4EW5925	Review timelines and discovery responses in preparation for discovery deficiency email
█	█	█	█	█	█		█	█
OMA	OMID ABAEI	07/09/25	B	0.60	135.00		4EW5946	Review discovery materials in preparation for conference call with opposing counsel
OMA	OMID ABAEI	07/09/25	B	0.90	202.50		4EW5954	Conference call with opposing counsel regarding discovery issues
OMA	OMID ABAEI	07/09/25	B	1.10	247.50		4EW6363	Prepare email correspondence to opposing counsel, B. DeLuca and G. Cormier regarding agreements in discovery
█	█	█	█	█	█		█	█
█	█	█	█	█	█		█	█
OMA	OMID ABAEI	07/10/25	B	1.60	360.00		4EW6626	Review Moblize's discovery responses in preparation for meeting with client
OMA	OMID ABAEI	07/10/25	B	1.00	225.00		4EW6628	Meet with J. Jensen and G. Cormier regarding Moblize's discovery responses
OMA	OMID ABAEI	07/10/25	B	0.70	157.50		4EW6630	Correspondence with E. Kudisch, M. Johnson, and J. Barbosa regarding discovery responses

Matter Ledger Report

5/1/2025 to 7/31/2025

	Code	Name	Init Atty	BLD	BRADLEY L. DELUCA
Client	24966	CORVA	Bill Atty	BLD	BRADLEY L. DELUCA
Matter	0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

Unbilled Time Continued

Code	Name	Date	Code	To Be Billed		Task	Ref #	Text
				Hours	\$ Value			
OMA	OMID ABAEI	07/11/25	B	0.20	45.00		4EX0532	Analyze discovery strategy and potential Motion for Sanctions
OMA	OMID ABAEI	07/11/25	B	0.30	67.50		4EX9707	Communications with G. Cormier regarding discovery strategy on potential Motion for Sanctions
OMA	OMID ABAEI	07/11/25	B	2.30	517.50		4EX9708	Research case law to support Motion for Sanctions
OMA	OMID ABAEI	07/14/25	B	1.20	270.00		4EX9709	Review Second Amended Discovery Responses
OMA	OMID ABAEI	07/14/25	B	3.30	742.50		4EX9710	Research case law in support of Motion for Sanctions
OMA	OMID ABAEI	07/14/25	B	1.50	337.50		4EX9711	Draft Motion for Sanctions
OMA	OMID ABAEI	07/15/25	B	0.90	202.50		4EX9717	Review Moblize's document production
OMA	OMID ABAEI	07/16/25	B	1.60	360.00		4EX9721	Review Moblize's document production
OMA	OMID ABAEI	07/16/25	B	0.50	112.50		4EX9722	Draft Motion for Sanctions
OMA	OMID ABAEI	07/16/25	B	0.10	22.50		4EX9723	Correspondence with E. Kudisch regarding discovery strategy for document production
OMA	OMID ABAEI	07/16/25	B	0.40	90.00		4EX9730	Review Moblize's Response to S. Gupte's Motion for Summary Judgment
OMA	OMID ABAEI	07/17/25	B	4.20	945.00		4EX9732	Draft Motion for Sanctions
OMA	OMID ABAEI	07/17/25	B	1.70	382.50		4EX9734	Review documents produced by Moblize
OMA	OMID ABAEI	07/17/25	B	0.40	90.00		4EX9736	Review exhibits to Response to S. Gupte's Motion for Summary Judgment
OMA	OMID ABAEI	07/18/25	B	0.50	112.50		4EX9742	Review revisions to Motion for Sanctions
OMA	OMID ABAEI	07/18/25	B	0.70	157.50		4EX9748	Revise Motion for Sanctions
OMA	OMID ABAEI	07/18/25	B	2.00	450.00		4EX9749	Draft joint letter for conference
OMA	OMID ABAEI	07/18/25	B	0.40	90.00		4EY5100	Correspondence with opposing counsel regarding joint letter to Court
OMA	OMID ABAEI	07/18/25	B	0.20	45.00		4EY5104	Review previous joint letters in preparation for drafting
OMA	OMID ABAEI	07/18/25	B	2.60	585.00		4EY5126	Review documents produced by Moblize
OMA	OMID ABAEI	07/21/25	B	0.80	180.00		4EX9751	Revise joint letter to the Court regarding Motion for Sanctions
OMA	OMID ABAEI	07/22/25	B	0.30	67.50		4EY6985	Strategy call with E. Kudisch regarding response to discovery motions
DSF	DEREK SCOTT FRANCK	07/23/25	B	0.60	57.00		4EX5137	Review and revise joint letter regarding discovery dispute
OMA	OMID ABAEI	07/23/25	B	0.80	180.00		4EX9753	Review and revise joint letter to the Court
OMA	OMID ABAEI	07/24/25	B	0.10	22.50		4EY6991	Correspondence with K. Picota regarding discovery conference
OMA	OMID ABAEI	07/24/25	B	0.30	67.50		4EY6993	Review Moblize's argument in joint letter to Court on discovery issues
OMA	OMID ABAEI	07/25/25	B	0.30	67.50		4EY5147	Analyze discovery and court filings; draft correspondence to opposing counsel regarding discovery dispute
		07/25/25	B	0.20	45.00		4EY6996	Correspondence with J. Jensen regarding discovery dispute

Matter Ledger Report

5/1/2025 to 7/31/2025

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Matter	0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

Unbilled Time Continued

Code	Name	Date	Code	To Be Billed		Task	Ref #	Text
				Hours	\$ Value			
OMA	OMID ABAEI							
OMA	OMID ABAEI	07/25/25	B	0.10	22.50		4EY6997	Review correspondence from J. Jensen; Review Judge Bennett's court procedures
	OMID ABAEI		B					
OMA	OMID ABAEI	07/25/25	B	0.80	180.00		4EY6999	Revise Motion for Sanctions
OMA	OMID ABAEI	07/25/25	B	0.50	112.50		4EY7006	Research case law on sanctions for falsely certified interrogatory responses
OMA	OMID ABAEI	07/25/25	B	1.30	292.50		4EY7008	Review previous filings and correspondences and analyze for inclusion in Motion for Sanctions
OMA	OMID ABAEI	07/25/25	B	0.50	112.50		4EY7009	Research case law on sanctions for violating protective order
OMA	OMID ABAEI	07/28/25	B	0.50	112.50		4EY7014	Draft Motion for Sanctions
OMA	OMID ABAEI	07/29/25	B	0.50	112.50		4EY7015	Review protective order and analyze relevant clauses for inclusion in Motion for Sanctions
OMA	OMID ABAEI	07/29/25	B	0.40	90.00		4EY7016	Call with E. Kudisch and Z. Carrabine regarding , Motion for Sanctions, and protective order
OMA	OMID ABAEI	07/29/25	B	0.20	45.00		4EY7017	Correspondence with opposing counsel regarding re-designation of documents
OMA	OMID ABAEI	07/30/25	B	0.10	22.50		4EY7020	Correspondence with opposing counsel regarding breach of protective order
OMA	OMID ABAEI	07/30/25	B	1.10	247.50		4EY7021	Review produced documents, filings, and emails to gather exhibits for Motion for Sanctions
OMA	OMID ABAEI	07/30/25	B	2.60	585.00		4EY7023	Review documents produced by Moblize
MAJ	MILLARD A. JOHNSON	07/31/25	B	0.80	320.00		4EY3899	Review and revise Motion for Sanctions
OMA	OMID ABAEI	07/31/25	B	2.00	450.00		4EY7024	Revise Motion for Sanctions
OMA	OMID ABAEI	07/31/25	B	0.20	45.00		4EY7025	Correspondence with E. Kudisch regarding Moblize's discovery abuses
OMA	OMID ABAEI	07/31/25	B	0.10	22.50		4EY7026	Correspondence with G. Cormier regarding Motion for Sanctions
Billable								
Non-Billable								
Suppressable								
Total Unbilled Time								
						Matter		
						Hours	Value	
						Total		

Unbilled Expenses

Code	Description	Date	Ck #	Ck Date	To Be Billed	Ref #	Text
					\$ Value		
E106	Online research	06/30/25				4EU8498	

Matter Ledger Report

5/1/2025 to 7/31/2025

	Code	Name	Init Atty	BLD	BRADLEY L. DELUCA
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Matter	0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

- Unbilled Expenses Continued

Code	Description	Date	Ck #	Ck Date	To Be Billed \$ Value	Ref #	Text
	Advanced				0.00		
	Non-Cash				177.07		Matter Value
	Total Unbilled Expenses				177.07	Total	177.07

- Billed Time

[illegible]

Matter Ledger Report

5/1/2025 to 7/31/2025

Code	Name	Init Atty	BLD	BRADLEY L. DELUCA
Client 24966	CORVA	Bill Atty	BLD	BRADLEY L. DELUCA
Matter 0005	MOBLIZE	Resp Atty	BLD	BRADLEY L. DELUCA

Billed Time Continued

Code	Name	Date	Code	Hours	\$ Value	Task	Ref #	Text
OMA	OMID ABAEI	05/21/25	B	0.50	112.50		4EN6664	Strategize regarding , and discovery disputes
OMA	OMID ABAEI	05/21/25	B	1.00	225.00		4EN6665	Telephone call with J. Barbosa and E. Kudisch regarding discovery
OMA	OMID ABAEI	05/21/25	B	0.20	45.00		4EN6666	Prepare for discovery conference call by reviewing production
OMA	OMID ABAEI	05/21/25	B	0.30	67.50		4EN6667	Correspondence with G. Cormier regarding discovery call
OMA	OMID ABAEI	05/21/25	B	0.30	67.50		4EN6672	Telephone call with G. Cormier regarding case strategy and updates
OMA	OMID ABAEI	05/23/25	B	0.20	45.00		4EN6668	Correspondence with opposing counsel regarding discovery requests
OMA	OMID ABAEI	05/29/25	B	0.20	45.00		4EN6674	Review correspondence from J. Barbosa regarding discovery
Billable								
Non-Billable								
Suppressable								
Total Billed Time								

Billed Expenses

Code	Description	Date	Check #	Ck. Date	\$ Value	Ref #	Text
E124	Other	05/12/25	27066	5/14/2025		4EJ7120	Potbelly for the Randal Johnston Deposition
E124	Other	05/13/25	27066	5/14/2025		4EJ8889	Potbelly for Amit Mehta's Deposition
E106	Online research	05/31/25				4EM9505	Westlaw
Advanced							
Non-Cash							
Total Billed Expenses							

End of Report