

attorney work-product doctrine, or other basis for non-disclosure. Based on the information currently available to Comcast, their initial disclosures are as follows:

I. PARTIES TO THIS ACTION

Pursuant to the Court's Order Governing Proceedings, Comcast believes the correct names of Plaintiffs are as follows based on their Complaint [ECF No. 1]:

Alkiviades David
FilmOn TV LTD.
FilmOn TV Inc.
Alki David Productions Inc.
Hologram USA
SWISSX

The following are the correct names of Defendants:

Comcast Corporation¹
Comcast Ventures, LLC

Comcast reserves the right to amend and/or supplement this response as additional facts are disclosed in discovery.

II. POTENTIAL PARTIES TO THIS ACTION

Pursuant to the Court's Order Governing Proceedings, Comcast is not aware of any other potential parties to this action as of the date of this disclosure. Comcast reserves the right to amend and/or supplement this response as additional facts are disclosed in discovery.

III. PERSONS WITH KNOWLEDGE OF RELEVANT FACTS

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i) and this Court's Order Governing Proceedings, Comcast believes the following individuals are likely to have discoverable information that Comcast may use to challenge the claims asserted and/or support the

¹ Although Plaintiffs have filed suit against "Comcast Inc.," such entity does not exist and Defendants assume that Plaintiffs intended to name "Comcast Corporation."

asserted defenses. Comcast does not consent to or authorize any communication between their employees and Plaintiffs, Plaintiffs' counsel, or counsel's agents that is otherwise prohibited by applicable rules of ethic and professional conduct.

Individual and Contact Information	Topics
<p>Alkiviades David</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>Plaintiff Alkiviades David may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs' antitrust allegations, the factual basis of his ADA allegations, and Plaintiffs' alleged damages. Mr. David also may have knowledge of discoverable information related to the relationship between each plaintiff as it is believed he is a principal of every other plaintiff in this action.</p>
<p>FilmOn TV LTD.</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>Plaintiff FilmOn TV LTD. may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs' antitrust allegations, the factual basis of Mr. David's ADA allegations, and Plaintiffs' alleged damages.</p>
<p>FilmOn TV Inc.</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>Plaintiff FilmOn TV Inc. may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs' antitrust allegations, the factual basis of Mr. David's ADA allegations, and Plaintiffs' alleged damages.</p>
<p>Alki David Productions Inc.</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>Alki David Productions Inc. may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs' antitrust allegations, the factual</p>

Individual and Contact Information	Topics
	basis of Mr. David’s ADA allegations, and Plaintiffs’ alleged damages.
<p>Hologram USA</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>Hologram USA may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs’ antitrust allegations, the factual basis of Mr. David’s ADA allegations, and Plaintiffs’ alleged damages.</p>
<p>SWISSX</p> <p>c/o Mark J. Lieberman 1704 Pine Hills Lane Corinth, Texas 76210 (817) 905-3772</p>	<p>SWISSX may have knowledge of discoverable information relating to the claims and/or defenses asserted in this action, including but not limited to, information regarding the factual basis of Plaintiffs’ antitrust allegations, the factual basis of Mr. David’s ADA allegations, and Plaintiffs’ alleged damages.</p>
<p>Corporate Representative(s) and/or Employees of Comcast Corporation</p> <p>c/o Thomas F.A. Hetherington Andrew R. Kasner Renee T. Wilkerson McDowell Hetherington LLP 1001 Fannin Street, Suite 2400 Houston, TX 77002 (713) 337-5585</p>	<p>Comcast Corporation does not believe it has knowledge of discoverable information relating to the claims asserted in this action.² Comcast Corporation has knowledge of discoverable information relating to its defenses, including but not limited to lack of involvement in the purported conspiracy.</p>

² As explained in Comcast’s Motion to Dismiss, Plaintiffs’ Complaint fails to place Comcast on notice of the factual underpinnings of its claims. As a result, Comcast’s counsel requested information during the parties’ August 4, 2023 Rule 26(f) Conference regarding the basis of Plaintiffs’ claims and the identities of Comcast employees that may have knowledge of such claims. Comcast requested this information so it could perform an investigation consistent with its obligations under Rule 26. Plaintiffs’ counsel indicated that he would provide the requested information to Comcast, and a list of persons with potential knowledge was disclosed on August 17, 2023. As of the date of this disclosure, Comcast is still analyzing the alleged involvement of the individuals disclosed by Plaintiffs’ counsel and continues to investigate whether any of its employees may have been involved with or may otherwise possess discoverable information regarding Plaintiffs’ claims.

Individual and Contact Information	Topics
Corporate Representative(s) and/or Employees of Comcast Ventures, LLC c/o Thomas F.A. Hetherington Andrew R. Kasner Renee T. Wilkerson McDowell Hetherington LLP 1001 Fannin Street, Suite 2400 Houston, TX 77002 (713) 337-5585	Comcast Ventures, LLC does not believe it has knowledge of discoverable information relating to the claims asserted in this action. Comcast Ventures, LLC has knowledge of discoverable information relating to its defenses, including but not limited to lack of involvement in the purported conspiracy.

Comcast reserves the right to amend and/or supplement this list to the extent Plaintiffs amend their pleadings to put Comcast on notice of the basis of Plaintiffs’ claims and/or as additional facts discovered regarding the basis of Plaintiffs’ claims against Comcast.

IV. AUTHORIZATIONS

Comcast does not have any records to disclose or authorizations to provide to Plaintiffs’ counsel pursuant to Local Rule CV-34.

V. DOCUMENTS

Consistent with Footnote 2 above, Comcast is not aware of any categories of documents in its possession, custody, or control that may be relevant to the claims or defenses of any party to this action. Thus, Comcast is not able to produce any such materials pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii) or as required by the Court’s Order Governing Proceedings.

Comcast reserves the right to amend and/or supplement this response to the extent Plaintiffs amend their pleadings to put Comcast on notice of the basis of their claims or to the extent additional facts are discovered in the discovery process suggesting that Comcast may have documents in its possession, custody, or control that may be relevant to the claims or defenses at issue in this action.

VI. DAMAGES

Comcast has not made any counterclaims for damages to date. Therefore, a computation of damages pursuant to Federal Rule of Civil Procedure 26(a)(1)(iii) is not required at this time.

VII. INSURANCE

Comcast does not maintain insurance coverage applicable to this matter.

Respectfully submitted,

By: /s/ Andrew R. Kasner

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**Attorney-in-charge*

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, I served a copy of the foregoing document on the following via US Mail:

Mark J. Lieberman
1704 Pine Hills Lane
Corinth, Texas 76210

/s/ Andrew R. Kasner
Andrew R. Kasner