

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

SAFE DRIVING TECHNOLOGIES LLC,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

C.A. No. 21-cv-64-MN

PATENT CASE

JURY TRIAL DEMANDED

**DEFENDANT FORD MOTOR COMPANY’S FIRST SET OF INTERROGATORIES
TO PLAINTIFF SAFE DRIVING TECHNOLOGIES LLC (NO. 1)**

Pursuant to Federal Rules of Civil Procedure 33, Defendant Ford Motor Company (“Ford”) submits this interrogatory to Plaintiff Safe Driving Technologies LLC (“Safe Driving” or “Plaintiff”). Plaintiff must answer this interrogatory under oath within 30 days.

DEFINITIONS

1. The term “’994 Patent” refers to U.S. Patent No. 9,713,994 issued on July 25, 2017.
2. The term “’108 Patent” refers to U.S. Patent No. 8,301,108 issued on October 30, 2012.
3. The term “’170 Patent” refers to U.S. Patent No. 9,047,170 issued on June 2, 2015.
4. The term “’709 Patent” refers to U.S. Patent No. 10,532,709 issued on January 14, 2020.

5. The term “Asserted Patents” or “Patents-in-Suit” refers to the ’994 Patent, ’108 Patent, ’170 Patent, and ’709 Patent.

6. The term “Asserted Claim(s)” refers to each claim in each of the Asserted Patents that You contend is infringed by the Defendant.

7. “Ford” or “Defendant” shall mean Ford Motor Company and all of Ford’s predecessors (merged, acquired, or otherwise), successors, subsidiaries, divisions, departments, affiliates, sister and parent entities, and all of its present and former officers, directors, agents, representatives, employees, and other persons acting on its behalf.

8. “Safe Driving” or “Plaintiff” or “You” or “Your” shall mean Safe Driving Technologies LLC, all of Safe Driving’s predecessors (merged, acquired, or otherwise), successors, subsidiaries, divisions, departments, affiliates, sister and parent entities, and all of its present and former officers, directors, agents, representatives, employees, and other persons acting on its behalf.

9. The term “document” is synonymous in meaning and equal in scope to the usage of this term in Rule 34(a) of the Federal Rules of Civil Procedure and shall be construed to mean, without limitation, any written, printed, typed, stored, photographed, recorded, or otherwise reproduced communication, compilation, or reproduction, including computer or electronically generated or stored information or data, whether assertedly privileged or not. The term “document” also specifically includes all forms of electronic data. A draft or non-identical copy is a separate document within the meaning of this term.

10. The term “thing” is used in the most comprehensive and inclusive sense permitted by Rule 34 of the Federal Rules of Civil Procedure, and shall include, but is not limited to, objects of every kind and nature other than a document. By way of example, and not by way of limitation, the term “thing” includes prototypes, models, specimens, and the like, and commercially manufactured items.

11. “Identify” when used with respect to documents shall mean to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document, author(s),

address(es), and recipient(s); and (iv) Bates number(s) of the document, and to identify the present custodian of the document.

12. “Infringe” and “infringement” shall mean direct infringement, contributory infringement, inducement, literal infringement, or infringement by the doctrine of equivalents.

13. The terms “referring to,” “relating to” or “regarding” shall mean refers to, relates to, is relevant to, constitutes, comprises, contains, sets forth, proposes, explains, reflects, implies, pertains to, alludes to, concerns, is connected with, involves, describes, supports, identifies, evidences, shows, is associated with, or in any way touches upon.

14. “All” shall mean “any and all” and the word “any” shall mean “any and all.”

15. “And” and “or” shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories any information that would otherwise not be brought within their scope.

16. The singular shall include the plural and the masculine gender shall include the feminine and gender neutral.

INSTRUCTIONS

1. In answering and responding to this interrogatory, You are requested to furnish all information available to Safe Driving, its attorneys, accountants, investigators, representatives, agents, and any other person acting on Safe Driving’s behalf and not merely such information as is known by Your own personal knowledge. If You cannot answer or respond in full after exercising due diligence to secure the information, answer or respond to the extent possible, specifying the reason or reasons for Your inability to answer or respond to the remainder.

2. In answering or responding to this interrogatory, identify each and every person who supplied factual information given in the answer or response to each interrogatory subpart.

3. If, because of a claim of privilege or other protection, You do not answer or respond to any interrogatory or subpart thereof, or You withhold any document or thing, set forth the privilege or protection claimed, the facts upon which You rely to support the claim of privilege or protection, and furnish a list identifying each document and thing for which the privilege or protection is claimed, together with the following additional information:

(a) A brief description of the nature and subject matter of the document or thing, including the title, type of document (*i.e.*, whether it is a letter, memorandum, drawing, etc.) or thing, the number of pages, attachments or appendices to the document, and all serial or identification numbers appearing on the document;

(b) The document's date or the thing's date of creation;

(c) The identity of the author(s) or creator(s);

(d) The identity of the person(s) to whom the document is addressed or to whom the thing has been provided, including all persons who received copies, photographs, or other representations of the document or thing;

(e) The identity of the person(s) to whom the document or thing was sent;

(f) The identity of the present custodian of the document or thing;

(g) The current location of the document or thing;

(h) For each withheld document, its number of pages; and

(i) The interrogatory or subpart to which the document, withheld information, or other thing is otherwise responsive.

4. Any recipient of this interrogatory who objects to any portion or subpart of this interrogatory shall state the objection to such portion or subpart, and shall answer any

unobjectionable portion(s) or subpart(s) and/or provide the unobjectionable information requested.

5. This Interrogatory is continuing in nature and require supplemental or additional responses in accordance with Rule 26(e) of the Federal Rules of Civil Procedure. Accordingly, if, after responding, Safe Driving obtains or becomes aware of any further information in response to this First Set of Interrogatories, Safe Driving is required to supplement its responses and provide Ford with such additional information in accordance with the requirements of Rule 26 of the Federal Rules of Civil Procedure.

6. If You opt to produce business records in lieu of a written response to an interrogatory pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, indicate for each such interrogatory or subpart thereof the corresponding responsive business records by Bates numbers.

INTERROGATORIES

INTERROGATORY NO. 1: To the extent You assert a priority date for any Asserted Claim that is earlier than the filing date of the Asserted Patent reciting that Asserted Claim, state the effective filing date to which You contend the Asserted Claim is entitled, and Identify in detail with specific citations the earliest supporting disclosure for each element of the Asserted Claim.

RESPONSE:

Dated: April 28, 2021

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NOTICE OF SERVICE

I, Helena C. Rychlicki, Esq., hereby certify that on April 28, 2021, copies of *Defendant Ford Motor Company's First Set of Interrogatories to Plaintiff Safe Driving Technologies LLC* (No. 1), were served on the following counsel of record via Email:

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