IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAFE DRIVING TECHNOLOGIES LLC Plaintiff, v. FORD MOTOR COMPANY Defendant.	Civil Action No. 21-cv-64-MN **JURY TRIAL DEMANDED**

PLAINTIFF'S RESPONSES AND OBJECTIONS TO FORD MOTOR COMPANY'S FIRST SET OF INTERROGATORIES (NO. 1)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, as well as Local Rule 26.1, Plaintiff Safe Driving Technologies, LLC ("SDT" or "Plaintiff") hereby makes the following objections and responses to Defendant Ford Motor Company's ("Ford") First Set of Interrogatories (No. 1).

Pursuant to Rule 26(e), Fed. R. Civ. P., Plaintiff reserves the right to supplement their responses as discovery progresses in this action.

General Objections

Plaintiff makes the following General Objections to Defendant's First Set of Interrogatories, which General Objections are hereby incorporated by reference and made part of their response to this Interrogatory.

1. Plaintiff objects to Defendant's "Definitions" and "Instructions" to the extent that they seek to impose requirements or obligations on Plaintiff in addition to or different from those imposed by the Federal Rules of Civil Procedure, the Local Rules of Civil Practice

and Procedure of the United States District Court for the District of Delaware ("Local Rules"), or any Order of this Court.

2. Plaintiff objects to Defendant's "Definitions" and "Instructions" to the extent that they purport to alter the plain meaning and/or scope of any specific request, on the ground that such alteration renders the request vague, ambiguous, overly broad, unduly burdensome, and/or uncertain.

3. Plaintiff objects to Defendant's definitions of "Identify" as vague, ambiguous, overly broad, unduly burdensome, and not proportional to the needs of this case.

4. Plaintiff reserves the right to supplement its response to this Interrogatory as fact and expert discovery proceed in this action.

5. Plaintiff objects to Defendant's Interrogatory to the extent the information sought may be derived or ascertained from public documents, and the burden of deriving or ascertaining such information from such documents is substantially the same for Plaintiff as for Defendant.

6. Plaintiff objects to this Interrogatory to the extent it prematurely seeks expert testimony.

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 TO INTERROGATORY NO. 1:

Plaintiff objects to this Interrogatory as improper under Rule 33(a), Fed. R. Civ. P., because it purports to be a single Interrogatory but contains multiple subparts. Plaintiff further objects to this Interrogatory as overly broad and unduly burdensome as seeking information that is not relevant to the parties' claims and defenses and as not proportional to the needs of this case. Plaintiff further objects to this Interrogatory to the extent it seeks information that is not in Plaintiff's possession, custody or control, or is within the possession of a third party. Plaintiff also objects to this Interrogatory to the extent that it seeks information, documents or things that are protected by the attorney-client privilege, attorney work-product doctrine, or any other applicable privilege or immunity.

Subject to and without waiving their General and Specific Objections, Plaintiff responds as follows. Plaintiff is entitled to a priority date at least as early as June 21, 2002, for each of the Asserted Patents. *See* U.S. Provisional Patent Application No.60/336,293 filed Oct. 24, 2001, and U.S. Provisional Patent Application No. 60/390,877 filed Jun. 21, 2002. Discovery is ongoing, and Plaintiff reserves to right to amend its response to this interrogatory in accordance with the case schedule.

Dated: May 28, 2021

Respectfully submitted,

Of Counsel:

FARNAN LLP

Michael E. Shanahan
Andrew M. Goldberg
BAILEY DUQUETTE P.C.
104 Charlton Street, 1-W
New York, NY 10014
T.: 212.658.1946
Michael@baileyduquette.com
Hanna@baileyduquette.com

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
Facsimile: (302) 777-0301
Email: bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Plaintiff Safe Driving Technologies LLC

CERTIFICATE OF SERVICE

I, Brian E. Farnan hereby certify that on May 28, 2021, a copy of Plaintiff's Responses and Objections to Ford Motor Company's First Set of Interrogatories (No. 1) was served on the following as indicated:

Via E-Mail
Helena C. Rychlicki
Pinckney, Weidinger, Urban & Joyce LLC
2 Mill Road, Suite 204
Wilmington, Delaware 19806
HRychlicki@pwujlaw.com

Attorneys for Defendant Ford Motor Company

Via E-Mail
John S. LeRoy
Christopher C. Smith
Reza Roghani Esfahani
BROOKS KUSHMAN P.C.
jleroy@brookskushman.com
csmith@brookskushman.com
resfahani@brookskushman.com

Attorneys for Defendant Ford Motor Company

/s/ Brian E. Farnan
Brian E. Farnan (Bar No. 4089)