

Request for Production No. 47:

All source code for each of the Accused Products.

RESPONSE:

Ford objects to this Request as overly broad to the extent that it seeks “all source code.” SDT has not yet provided infringement contentions in connections with Ford’s Accused Products. Moreover, SDT has not fully identified relevant portions or functionality of the Accused Products. Accordingly, this Request may seek documents that are not relevant to the issues in this case.

Subject to and without waiving the foregoing general and specific objections, Ford responds as follows: Ford will not produce any documents in response to this Request at this time. Ford is, however, willing to meet and confer with Plaintiff regarding both the scope and the relevance of this Request as well as discussion about entry of a discovery plan for the discovery of source code.

Request for Production No. 48:

All source code for managing, controlling, supporting, updating, or monitoring each of the Accused Products.

RESPONSE:

Ford objects to this Request as overly broad to the extent that it seeks “all source code.” SDT has not yet provided infringement contentions in connections with Ford’s Accused Products. Moreover, SDT has not fully identified relevant portions or functionality of the Accused Products. Accordingly, this Request may seek documents that are not relevant to the issues in this case. Subject to and without waiving the foregoing general and specific objections, Ford responds as follows: Ford will not produce any documents in response to this Request at this time. Ford is, however, willing to meet and confer with Plaintiff regarding both the scope and the relevance of this Request as well as discussion about entry of a discovery plan for the discovery of source code.