

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT DELAWARE

adidas AG)
adidas America, Inc.)
)
Plaintiffs,)
) Civil Action No. 14-130-GMS
v.)
) **JURY TRIAL DEMANDED**
Under Armour, Inc.)
MapMyFitness, Inc.)
)
Defendants.

**PLAINTIFFS ADIDAS AG AND ADIDAS AMERICA, INC.'S FOURTH
SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANTS'
FIRST SET OF INTERROGATORIES (NO. 12)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Local Rule 26.1, and stipulation of the parties (D.I. 67), Plaintiffs adidas AG and adidas America, Inc. (collectively, "adidas" or "Plaintiffs"), by undersigned counsel, hereby make the following Fourth Supplemental Objections and Responses to Defendants' First Set of Interrogatories (No. 12).

adidas incorporates by reference the General Objections and Reservation of Rights set forth in Plaintiffs Objections and Responses to Defendants' First Set of Interrogatories.

ADIDAS'S SUPPLEMENTAL OBJECTIONS AND RESPONSES
INTERROGATORY NO. 12

For each asserted claim of the adidas Patents-in-Suit, separately identify, by product name, version, description and/or other identifying characteristic, every product You contend embodies the alleged invention of the asserted claim and describe, on an element-by-element basis, the basis for your contention, whether made now or in the past, that the product so

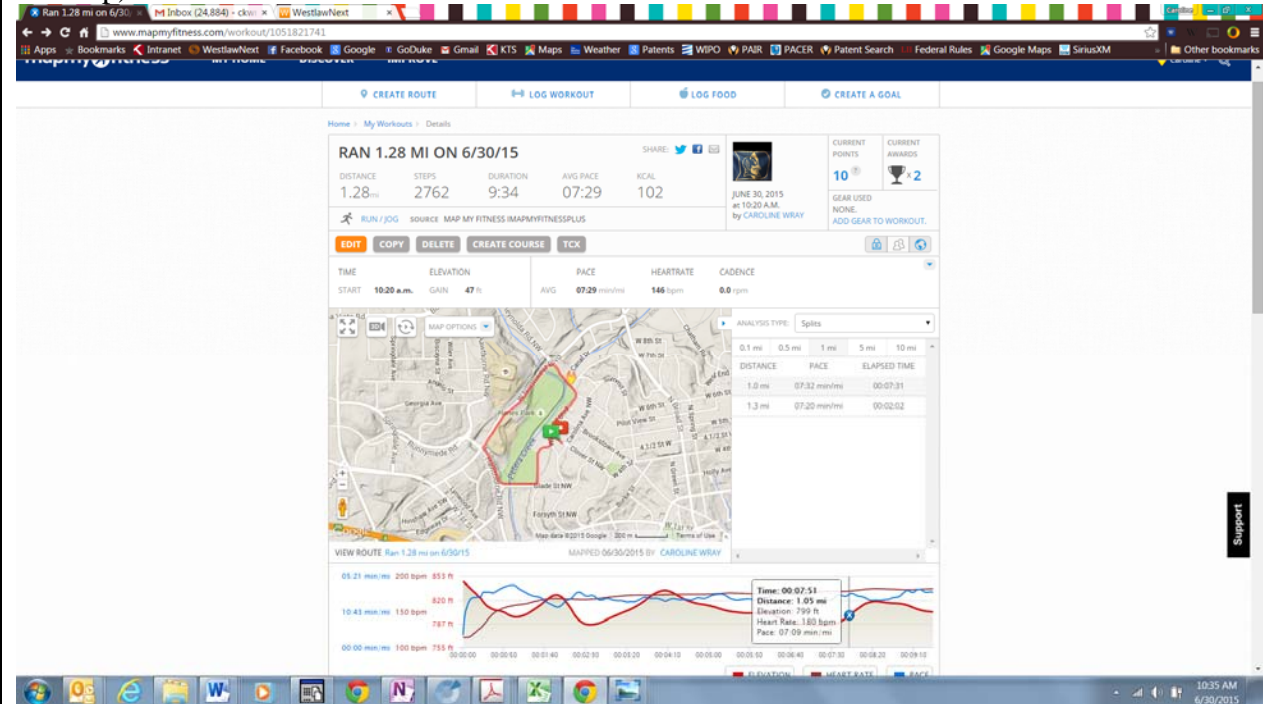
USDCDD 6570107 2

EXHIBIT A

Adidas AG v. Under Armour, Inc. et al. Civil Action No. 1:14-cv-00130-GMS
U.S. Patent No. 8,725,276 (Ellis) – Asserted Claim Nos. 3, 6, 7, 15, 18, 19, 22

correlating the performance data with the position data with at least one processor; and

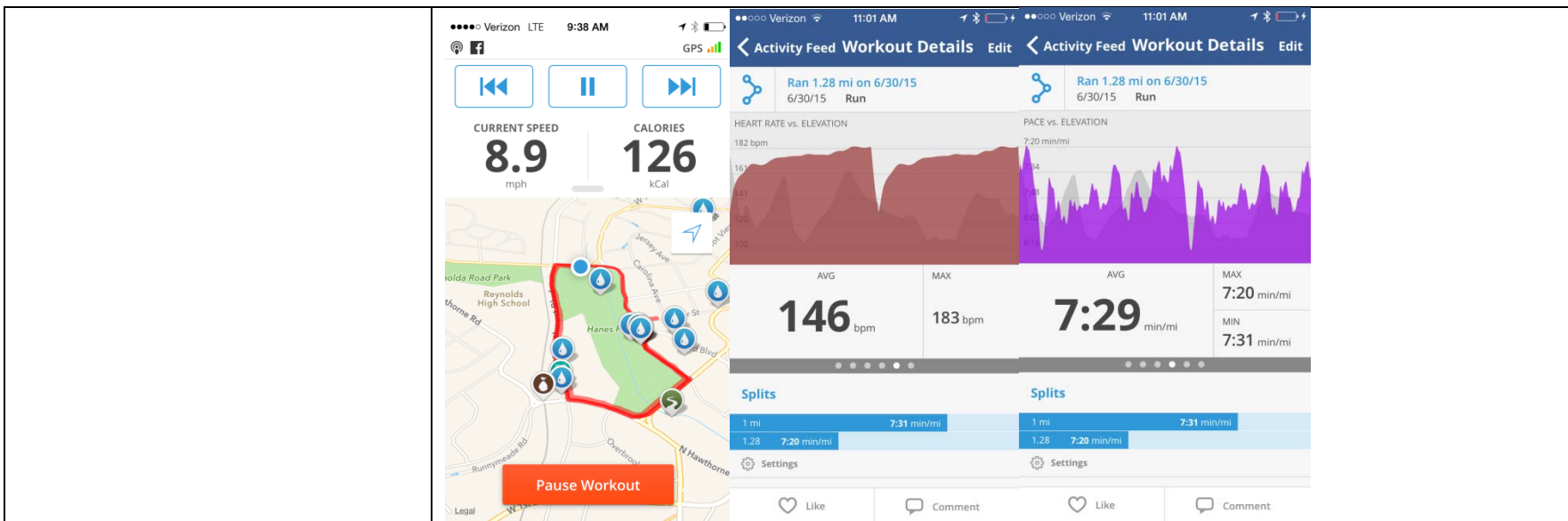
The MMF App uses at least one processor to correlate the performance data received by the performance monitor (e.g., heart rate data, Intensity data, speed data, etc.) with the GPS data reflecting the user's location at the time the performance data was collected. For example, as shown in the screenshot below, the user's pace, heart rate, and elevation are correlated with the user's location on the route at the time the data was collected (represented by the flame icon on the map):



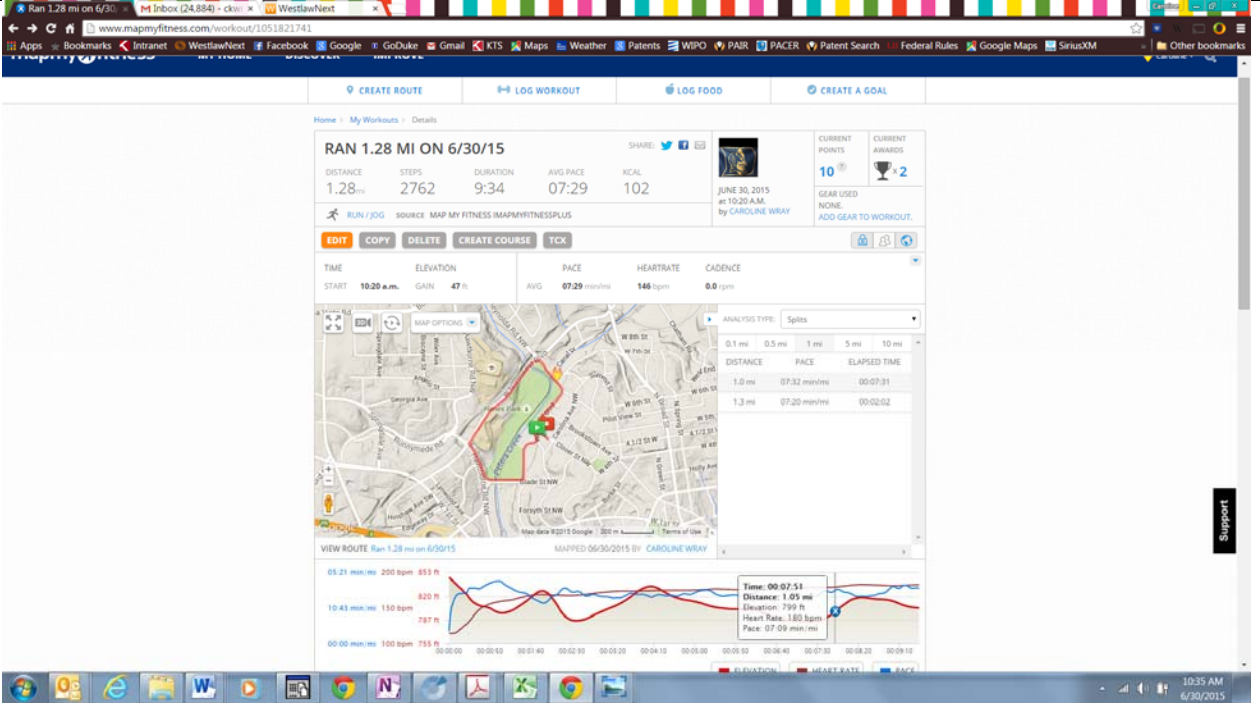
simultaneously displaying the position data and the performance data over a graphical representation of the route data during the traversal of the route with a display screen.

The MMF App simultaneously displays a graphical representation of the route data, the user's current position, and performance data, such as the user's heart rate or pace, as shown in the screenshots below:

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<p>18. The method of claim 16, wherein the position monitor comprises a global positioning satellite receiver.</p>	<p>The MMF App is designed to be used on mobile devices such as the Apple iPhone, Android Phones, and Windows Phone. Each of these devices includes a global positioning satellite (GPS) receiver. <i>See, e.g.</i>, https://support.mapmyfitness.com/hc/en-us/categories/200003344-Mobile-App-Questions. The MMF App uses this “built-in GPS technology to provide users worldwide with the ability to map, record and share their exercise routes and workouts in an online database.” <i>See, e.g.</i>, http://about.mapmyfitness.com/about/company-history/; <i>See also</i>, the GPS icon in the screenshot of the MMF app below:</p>