

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

AAMP OF FLORIDA, INC. d/b/a/  
AAMP OF AMERICA

Plaintiff,

v.

AUTOMOTIVE DATA  
SOLUTIONS, INC.,

Defendant.

Case No.: 8:13-cv-02019-MSS-TGW

**PLAINTIFF AAMP OF AMERICA'S  
AMENDED INTERROGATORY RESPONSES**

Plaintiff AAMP of America responds as follows to Defendant's interrogatories 1-12. AAMP has previously responded to interrogatories 1-7; some of those responses have been amended. AAMP is responding for the first time to ADS's interrogatories 8-12. AAMP reserves the right to supplement these responses as discovery progresses.

**General Objection**

1. AAMP objects to Defendant's introduction, definitions, and instructions to the extent they attempt to alter the scope of permissible discovery, the procedures therefore, or the parties' obligations as set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court.

## Responses

1. Provide all facts relating to any investigation conducted by you pursuant to Federal Rule of Civil Procedure 11 into whether any of the ADS Accused Products infringe the '540 patent as alleged in your Complaint.

**Response:** After conferring with ADS, ADS has advised AAMP that this interrogatory does not ask for information protected by the attorney/client privilege or the work product doctrine. With that understanding: AAMP, together with its counsel, investigated prior to filing this lawsuit whether the accused ADS products infringed AAMP's '540 and '825 patents. Specifically, AAMP and its counsel obtained the accused ADS steering wheel interface products and compared the products to the asserted claims of the '540 and '825 patents on a limitation by limitation basis, and concluded that there was a reasonable basis for a finding of infringement of at least the asserted claims of both asserted patents. The underlying details of such comparisons are privileged. AAMP's preliminary infringement contentions do, however, detail the conclusions reached by AAMP and its counsel as a result of AAMP's pre-filing investigation. AAMP has also reviewed ADS's non-infringement contentions and, notably, ADS does not identify a single meaningful distinction between the accused products and the invention claimed in AAMP's patents.

2. If you contend that the Accused Products contain the '540 patent's limitation of "... a transmitter adapted to produce and broadcast to the stereo receiver an output signal in the second format ... ," then provide all facts supporting your contention.

**Answer:** AAMP contends that the Accused Products contain the referenced limitation. The facts supporting that contention are set forth in AAMP's preliminary

that the Accused Products produce and broadcast to the stereo receiver an output signal in a second format. The equipment that broadcasts the output signal is, by definition, a transmitter.

3. Identify any business relationship, patent licensing arrangement, and any parent company and subsidiary company relationship between Lightning Audio (Lightning Audio has a website at <http://www.lightningaudio.com/>) and You (including PAC and P.B. Clarke and Associates) between 1997 and 2004.

**Response:** PAC and Lightning Audio had a business relationship in the sense that PAC sold products to Lightning Audio, which products Lightning Audio then resold.

4. Identify, as precise as possible, when You first sold or offered to sell in the United States each of the PAC SWI series of interface devices, including but not limited to SWI-1, SWI-2.

**Response:**

The SWI-1 was a prototype that was never offered for sale, in the United States or otherwise.

The SWI-2 was first sold after November 17, 1998, but before November 1999.

The SWI-3 was first sold after November 17, 1998, but before November 1999.

The SWI-4 was first sold after November 17, 1998, but before November 1999.

AAMP does not believe the SWI-5 was ever sold.

The SWI-6 was first sold after November 17, 1998, but before April 2000.

The SWI-7 was first sold after November 17, 1998, but before April 2000.

In addition to the responses above, AAMP would direct ADS to the following documents that, together with the response above, constitute all of AAMP's knowledge in response to the interrogatory:

- AAMP\_ADS004094-AAMP\_ADS004257
- AAMP\_ADS004258-AAMP\_ADS004371
- AAMP\_ADS004372-AAMP\_ADS004499
- AAMP\_ADS004712-AAMP\_ADS004719
- AAMP\_ADS004720-AAMP\_ADS004731
- AAMP\_ADS004732-AAMP\_ADS004742
- AAMP\_ADS004743-AAMP\_ADS004753
- AAMP\_ADS004754-AAMP\_ADS004763
- AAMP\_ADS005451-AAMP\_ADS005461
- AAMP\_ADS005463-AAMP\_ADS005626
- AAMP\_ADS007299-AAMP\_ADS007302
- AAMP\_ADS010660
- AAMP\_ADS011245
- AAMP\_ADS011246-AAMP\_ADS011247
- AAMP\_ADS011258
- AAMP\_ADS011261
- AAMP\_ADS011265
- AAMP\_ADS014521-AAMP\_ADS014529
- AAMP\_ADS18901-AAMP\_ADS18906

5. Identify, as precise as possible, when You first sold or offered to sell in the United States each of the Peripheral Electronics series of interface devices, including but not limited to PESWI-2, PESWI-3, PESWI-4, PESWI-6, and PESWI-7.

**Response:** The dates these devices were first sold in the United States are approximately the same as those listed for the correspondingly-numbered SWI-series interfaces discussed in interrogatory 4.

6. Identify all part and model numbers of all Steering Wheel Interface Devices You (including PAC and P.B. Clarke and Associates) sold or offered to sell prior to December 31, 2002. Identify, as precise as possible, when You first sold or offered to sell each of these identified devices.

**Response:** See AAMP's responses to interrogatories 4 and 5.

7. For each of the device you identified in Your response to Interrogatory No. 6, identify the name of the inventor or developer, whether the device was designed or developed by Brett Riggs, whether the development process of the device involved Terry Weeder, and whether the device was an embodiment of the invention disclosed in U.S. Patent 6,956,952.

**Response:** Brett Riggs is the inventor and developer of all of the devices identified in AAMP's response to interrogatory 6. Terry Weeder was hired by Mr. Riggs in connection with the firmware for the SWI-2, SWI-4, and SWI-6. The Riggs family of patents, which includes U.S. Patent No. 6,956,952, discloses steering wheel interface devices, and the products identified in response to interrogatory 6 are covered by one or more claims of the patents of the Riggs family.

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