

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SIPCO, LLC, and IP CO, LLC
(d/b/a INTUS IQ),

Plaintiffs,

v.

Civil Action No. 6:15-cv-907

EMERSON ELECTRIC CO., EMERSON
PROCESS MANAGEMENT LLLP, FISHER-
ROSEMOUNT SYSTEMS, INC.,
ROSEMOUNT INC., BP, p.l.c., BP
AMERICA, INC., and BP AMERICA
PRODUCTION COMPANY,

Defendants.

**BP DEFENDANTS' OBJECTIONS AND RESPONSES
TO PLAINTIFFS' SECOND SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants BP p.l.c., BP America, Inc., and BP America Production Company (collectively, "BP Defendants" or "BP"), object to and respond to Plaintiffs SIPCO, LLC and IP CO, LLC (d/b/a INTUS IQ) (collectively, "Plaintiffs" or "SIPCO") Second Set of Interrogatories.

INTERROGATORIES TO BP DEFENDANTS

INTERROGATORY NO. 5:

Identify each and every "BP-Owned Installation" where any Accused Product has been and/or currently is being demonstrated, developed, installed, implemented, tested and/or used.

RESPONSE:

The BP Defendants object to this interrogatory as vague to the extent that it seeks

information as to where the accused products have been “demonstrated, developed, installed, implemented, tested and/or used.” The BP Defendants further object to this interrogatory as overly broad and unduly burdensome, lacking proportion to the issues in dispute in this action. The named BP Defendants object to the purported scope of these interrogatories as requesting information from individuals and corporate entities other than the BP entities named as defendants in this action. The term “BP Defendant” is improperly defined as any BP-owned or controlled company, “or affiliated entity, subsidiaries thereof, together with any and all controlling or affiliated companies, and all officers, directors, employees, agents, representatives and all other persons acting, purporting to act, who have acted, or who purported to have acted on behalf of any of the foregoing.” The BP Defendants further object to this interrogatory as overly broad and unduly burdensome and lacking proportionate value to issues in dispute in this action to the extent that this interrogatory purports to seek the disclosure of information relating any product other than the Emerson Smart Wireless products accused of infringement in this action. The BP Defendants also object to this interrogatory are overly burdensome to the extent that it purports to seek the disclosure of the use made of numerous products at many potential locations. The BP Defendants further object to this interrogatory as vague and confusing to the extent that it seeks information relating to product that is “demonstrated.” As BP Defendants understand that term, they do not “demonstrate” products. Because BP Defendants’ investigation into the use of the accused products at specific facilities is on-going, BP Defendants reserve the right to supplement this response. Subject to these objections and reservation, BP America Production Company further responds by advising that contractors installed certain of the accused products at the following five East Texas locations: 1) Carthage West Haynesville Facility; 2) BP Fee 254, ; 3) Ticonderoga Central Delivery Point; (4) BP Fee

344; and 5) Wombat 1-H Well. The device at the Wombat location has since been removed.

INTERROGATORY NO. 6:

For each and every “BP-Owned Installation” identified in response to Interrogatory No.5, identify, for each BP-Owned Installation, the Accused Product(s) that has been and/or currently is being used, tested, developed, and/or installed therein.

RESPONSE:

The BP Defendants object to this interrogatory as overly broad and unduly burdensome, lacking proportion to the issues in dispute in this action. The named BP Defendants object to the purported scope of these interrogatories as requesting information from individuals and corporate entities other than the BP entities named as defendants in this action. The term “BP Defendant” is improperly defined as any BP-owned or controlled company, “or affiliated entity, subsidiaries thereof, together with any and all controlling or affiliated companies, and all officers, directors, employees, agents, representatives and all other persons acting, purporting to act, who have acted, or who purported to have acted on behalf of any of the foregoing.” The BP Defendants further object to this interrogatory as overly broad and unduly burdensome and lacking proportionate value to issues in dispute in this action to the extent that this interrogatory purports to seek the disclosure of information relating any product other than the Emerson Smart Wireless products accused of infringement in this action. The BP Defendants also object to this interrogatory as overly burdensome to the extent that it purports to seek the disclosure of the use made of numerous products at a variety of locations. Because Defendants’ investigation into the use of the accused products at specific facilities is on-going, Defendants reserve the right to supplement this response. Subject to these objections and reservation, BP America Production Company (BPAPC) responds that it is not aware of any testing or development of the accused

products at its facilities. BPAPC further responds by advising that contractors installed the accused products at the facilities identified in response to interrogatory 5, above.

Dated: July 25, 2016

Respectfully Submitted,

/s/ James D. Berquist

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America, Inc., and BP America Production
Company*

CERTIFICATE OF SERVICE

I, James Berquist, hereby certify that on July 25, 2016 the foregoing document was served upon counsel of record for Defendants via first-class mail and electronic mail.

/s/ James D. Berquist

James Berquist