

# EXHIBIT 7

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

PHILIPS NORTH AMERICA LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 1:19-cv-11586-IT
v.	)	
	)	
FITBIT, INC.	)	
	)	
Defendant.	)	
	)	

**PHILIPS NORTH AMERICA LLC’S SECOND SET OF  
INTERROGATORIES TO FITBIT, INC. (Nos. 9-11)**

Pursuant to Rules 33 of the Federal Rules of Civil Procedure, Plaintiff Philips North America LLC (“Philips”) serves the following interrogatories to be answered separately and in writing under oath by Defendant Fitbit, Inc. (“Fitbit”) within thirty (30) days of service, supplemented thereafter as required by Rule 26(e), in accordance with the Federal Rules of Civil Procedure, the Local Rules, and the definitions and instructions below.

**INSTRUCTIONS AND DEFINITIONS**

1. Philips incorporates by reference, as if fully set forth herein, the Instructions and Definitions stated in its First Set of Interrogatories (Nos. 1-8), which were served on January 10, 2020.

## **INTERROGATORIES**

### **Interrogatory No. 9:**

Identify the total number of users that have logged into the Fitbit App using their Fitbit account from a mobile device from the years 2013 through 2020 and, if available, provide a breakdown of such total number of users per year and identification of the Fitbit activity tracker products being used by those users, as well as an explanation of the records relied on to make any determination as to said total number of users.

### **Interrogatory No.10:**

Identify the total number of users that have utilized the “voice cues” feature of the accused the Accused Products (as demonstrated in PNA-FB0000905) from 2015 through 2018 and, if available, provide a breakdown of such total number of users per year and an identification of the Fitbit activity tracker products being used by those users, as well as an explanation of the records relied on to make any determination as to said total number of users. To the extent device-specific information is available, Philips would agree to limit this interrogatory to the Ionic and Surge products.

### **Interrogatory No. 11:**

Identify the Fitbit individuals who communicated with Mr. Brian Sagi of Cerian Technology Ventures, LLC on or about the years 2013 through 2015, with regard to any patents on which Mr. Roger Quay was an inventor, including U.S. Patent No. 8,277,377 ('377), and explain the substance of those communication, including whether the '377 patent was identified in those communications.

Dated: September 2, 2020

Respectfully Submitted,

/s/ Ruben J. Rodrigues

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above document was served on September 2, 2020 on counsel for Defendant via electronic mail.

/s/ Ruben J. Rodrigues