

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UUSI, LLC, a Michigan domestic limited
liability company, d/b/a NARTRON,

Plaintiff,

vs.

Civil Action No: 2:13-cv-11704
HON. ARTHUR J. TARNOW
Mag. Judge Randon

WEBASTO ROOF SYSTEMS, INC.,
a Delaware Corporation,

Defendant.

Monte L. Falcoff (P48015)
George D. Moustakas (P41631)
Timothy D. MacIntyre (P53100)
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**PLAINTIFF UUSI, LLC, d/b/a NARTRON'S
DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

Pursuant to the Court's Scheduling Order (Dkt. No. 41), UUSI, LLC, d/b/a
Nartron ("UUSI" or "Plaintiff") provides the following asserted claims and

infringement contentions (“Disclosure”) with respect to U.S. Patent No. 7,548,037 (“the ‘037 Patent”), U.S. Patent No. 7,579,802 (“the ‘802 Patent”), and U.S. Patent No. 8,271,612 (“the ‘612 Patent”) (collectively the “Patents in Suit”) to Defendant Webasto Roof Systems, Inc. (“Webasto” or “Defendant”).

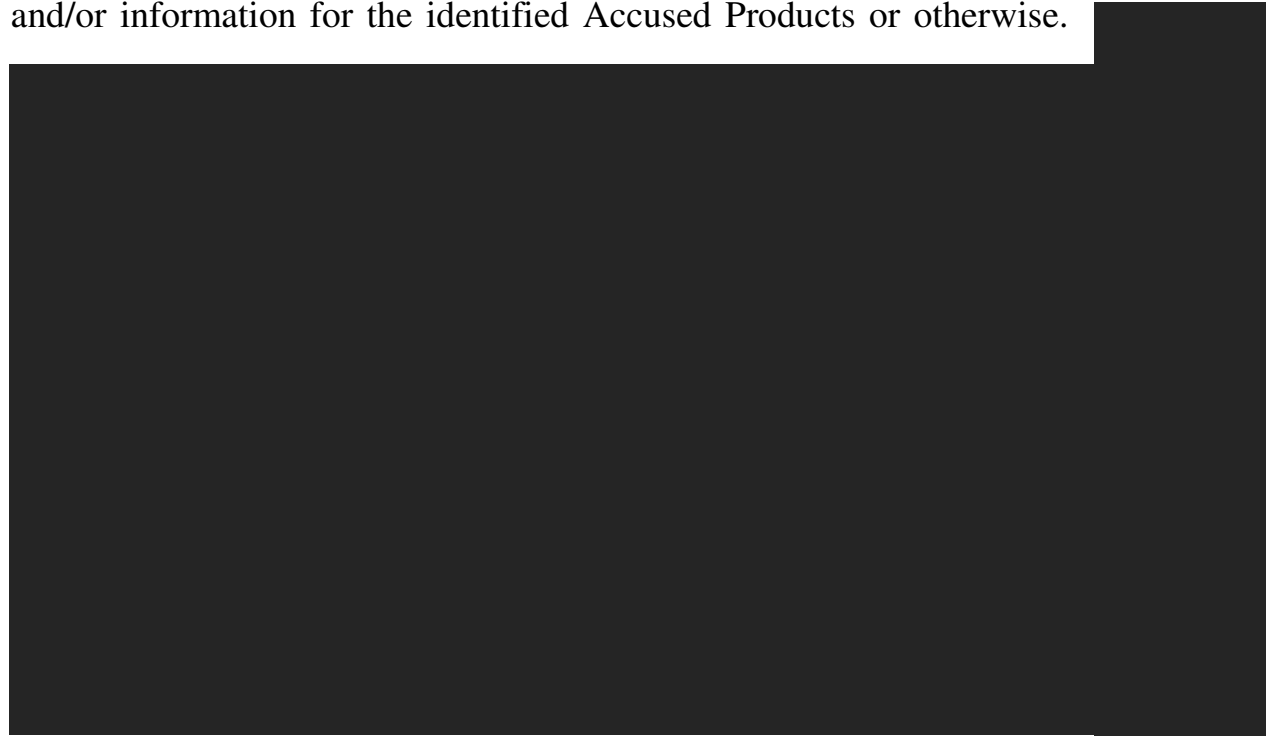
Discovery in this matter is ongoing as is Plaintiff’s investigation. This Disclosure is based on the information available to Plaintiff as of the date of this Disclosure. Plaintiff reserves the right to amend this Disclosure after further discovery, including to the full extent available in view of the Court’s ruling on claim construction. Plaintiff also reserves the right to assert additional claims of the Patents in Suit, accuse different products, or identify alternative literal and/or equivalent infringing elements in Defendant’s Accused Products as disclosed below.

Plaintiff asserts that Defendant has infringed and continues to infringe, at least, as noted in the following:

- The ‘037 Patent: Claim 1, 7, and 13 (see Exhibit A)
- The ‘612 Patent: Claims 1, 2, 5, 6, 7, and 8 (see Exhibit B)
- The ‘802 Patent: Claims 1, 6, 7, 8, 9, 11, 15 and 16 (see Exhibit C)

The claim charts set forth at Exhibits A, B and C, identify where each limitation of each claim is found within the Accused Products, based on information available to date as disclosed within the charts. For example,

Webasto's responses to Interrogatory No. 2 identified the Accused Products on September 25, 2013 and January 24, 2014. Discovery may disclose other products and/or information for the identified Accused Products or otherwise.



Plaintiff's contentions are not an admission, adoption or waiver of any particular claim construction, and Plaintiff therefore reserves all rights with respect to claim construction. As noted, Plaintiff reserves the right to supplement its contentions based on the Court's claim construction ruling and further reserves the right to supplement in view of the anticipated non-infringement positions that Webasto will take in response to Interrogatory No. 11 served on January 15, 2014. By way of further example and not by way of limitation, Webasto has already disclosed through its First Supplemental and Amended Response to Interrogatory No. 1, dated January 24, 2014, that it does not have a "regulator." Plaintiff in

Exhibit A, claim 1, identified two alternative positions for a “regulator.” Plaintiff, in addition, states that there is a third position -- one of ordinary skill in the art, for example, may identify a “regulator” as the interconnection between the sunroof and the motor assembly.

Each element of each asserted claim and is present literally or under the doctrine of equivalents in the Accused Products, because there is no substantial difference between the elements of the asserted claims and the corresponding elements in the Accused Products, i.e., the corresponding elements of the Accused Products do substantially the same thing, substantially the same way to achieve substantially the same result.

By: s/ George D. Moustakas /
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 18, 2014, the foregoing document was served on the following counsel of record via email:

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