

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT BOSCH LLC,

Plaintiff,

v.

ALBEREE PRODUCTS, INC.,
API KOREA CO., LTD.,
SAVER AUTOMOTIVE PRODUCTS, INC.,
AND COSTCO WHOLESALE
CORPORATION

Defendants.

C.A. No. 12-574-LPS, 14-142-LPS

**PLAINTIFF ROBERT BOSCH LLC'S AMENDED
RESPONSE TO DEFENDANT COSTCO WHOLESALE
CORPORATION'S FIRST SET OF INTERROGATORIES (NO. 1)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, plaintiff Robert Bosch LLC ("Bosch"), by and through its attorneys, hereby amends its response to Interrogatory No. 1 of defendant Costco Wholesale Corporation's ("Costco") First Set of Interrogatories (Nos. 1-3). Pursuant to Federal Rule of Civil Procedure 26(e), Bosch reserves the right to further supplement and/or amend its response.

GENERAL OBJECTIONS

Bosch incorporates herein the General Objections in Bosch's Objections and Responses to Costco Wholesale Corporation's First Set of Interrogatories (Nos. 1-3) served on March 30, 2015.

SPECIFIC OBJECTIONS AND RESPONSES

INTERROGATORY NO. 1:

Identify each product made, imported, offered for sale, or sold, by or for Bosch (meaning Plaintiff or any related entity), or licensed or otherwise authorized by Bosch, that

embodies or practices at least one claim of a patent asserted in this action, state the dates each such product was imported into or sold in the United States, identify each product that was marked with the number of an asserted patent (and state how and when), identify each agreement that reflects, or refers or relates to, the manufacture, importation, marketing, sale, supply or licensing of any product that embodies or practices at least one claim of a asserted patent or that is marked with its number, and identify by name and position each person with knowledge of such agreements or marking. The identification of a product should include all identifying information used by Bosch or its customers, including without limitation trade name, internal name, part number and SKU.

AMENDED RESPONSE:

Bosch objects to this Interrogatory because it contains at least five discrete subparts. Pursuant to Fed. R. Civ. P. 33(a)(1), Bosch will limit its answers to the first 25 written Interrogatories, including all discrete subparts.

Bosch also objects to this Interrogatory to the extent that the terms “made, imported, offered for sale, or sold ... for Bosch,” “otherwise authorized by Bosch,” and “reflects, or refers or relates to” render it vague and ambiguous.

Bosch objects to this Interrogatory to the extent that it calls for confidential information of one or more third parties to whom an obligation of confidentiality is owed. Bosch cannot provide such information until after necessary consents have been obtained from any third party to whom an obligation of confidentiality is owed.

Bosch objects to this Interrogatory to the extent that it seeks information that is protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege or immunity.

Subject to and without waiving its General Objections and the foregoing specific objections, and subject to its right to revise, amend, correct, supplement, modify, or clarify its response:

The following Bosch beam-type wiper blades have practiced and currently practice at least one claim of the following asserted patents:

Wiper Blade	Practiced Asserted Patents	First Marking Date and patents marked	Date First Sold
Original Equipment (OE) Wiper Blades (“Aerotwin”)	6,292,974 6,530,111 6,553,607 6,611,988 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520 7,941,891 8,099,823 8,272,096 8,544,136	Not marked	January 2002
ICON Generation 1	6,292,974 6,523,218 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520	Not marked	August 2005
ICON Generation 2	6,292,974 6,523,218 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520 7,941,891	June 2011 6,292,974 6,523,218 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520	June 2011

Wiper Blade	Practiced Asserted Patents	First Marking Date and patents marked	Date First Sold
ICON ClearMax 365 (Generation 3)	6,292,974 6,523,218 6,530,111 6,553,607 6,611,988 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520 7,941,891 8,099,823 8,272,096 8,544,136	January 2015 6,292,974 6,523,218 6,530,111 6,553,607 6,611,988 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520 7,941,891 8,099,823 8,272,096 8,544,136	August 2014
Evolution Generation 1	6,292,974 6,523,218 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520	Not marked	June 2008
Evolution Generation 2	6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520 7,941,891	April 2014 6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520	August 2012
Marathon Generation 1	6,292,974 6,523,218	June 2010 6,523,218	June 2010

Wiper Blade	Practiced Asserted Patents	First Marking Date and patents marked	Date First Sold
	6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520	6,675,434 6,836,926 6,944,905 6,973,698 7,228,588 7,293,321 7,484,264 7,523,520	
Marathon Generation 2	6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520 7,941,891	Not marked	October 2014
Clear Advantage	6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520 7,941,891	September 2013 6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520	December 2011
PerfectView	6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520 7,941,891 8,544,136	September 2013 6,292,974 6,530,111 6,553,607 6,675,434 6,836,926 6,944,905 6,973,698 7,293,321 7,523,520	September 2013
Insight	6,836,926 6,973,698	Not marked	May 2014

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