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VIA HAND DELIVERY

April 18, 2017

The Honorable Lisa R. Barton
Acting Secretary
U.S. International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

Ruffin B. Cordell
Principal
cordell@fr.com
202 626 6449 direct

Re: Certain Robotic Vacuum Cleaning Devices and Components Thereof Such as Spare Parts, Inv. No. 337-TA-__

Dear Secretary Barton:

Enclosed for filing on behalf of iRobot Corporation ("iRobot"), are the following documents in support of Complainant's request that the Commission commence an investigation pursuant to the provisions of Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337. Please note that Confidential Exhibits 40 and 106 to the Complaint contain Confidential Business Information and pursuant to the Commission's Rules of Practice and Procedure, a request for confidential treatment of the information in those exhibits accompanies this filing. Accordingly, Complainant submits the following:

1. One original and eight (8) paper copies of Complainant's Non-Confidential Verified Complaint and the Public Interest Statement (original unbound); one (1) CD of the Non-Confidential Exhibits, and one (1) CD of the Confidential Exhibits (Commission Rules 201.6(c), 210.4(f)(2) and 210.8(a)(1)(i) and 201.8(b));
2. Eleven (11) additional copies of the Non-Confidential Verified Complaint, and the Public Interest Statement, and eleven (11) CDs of the Non-Confidential Exhibits for service upon each proposed respondent (Commission Rules 210.8(a)(1)(iii) and 210.11(a));
3. Eleven (11) additional copies of the Confidential Exhibits on CD, one for each proposed respondent (Commission Rules 210.8(a)(1)(iii) and 210.11(a));
4. Three (3) additional copies of the Non-Confidential Verified Complaint for service upon the Embassy of Canada, the Embassy of the People's Republic of China, and the Embassy of Taiwan (Commission Rules 210.8(a)(1)(iv) and 210.11(a)(1)(ii));
5. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 6,809,490 (the "490 Patent"), identified as Exhibit 1 in the Complaint;

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6. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 7,155,308 (the “’308 Patent”), identified as Exhibit 2 in the Complaint;
7. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 8,474,090 (the “’090 Patent”), identified as Exhibit 3 in the Complaint;
8. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 8,600,553 (the “’553 Patent”), identified as Exhibit 4 in the Complaint;
9. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 9,038,233 (the “’233 Patent”), identified as Exhibit 5 in the Complaint;
10. One (1) certified copy of the asserted United States Patent: U.S. Patent No. 9,486,924 (the “’924 Patent”), identified as Exhibit 6 in the Complaint;
11. One (1) certified copy of the assignment for the ’490 Patent, identified as Exhibit 7 in the Complaint;
12. One (1) certified copy of the assignment for the ’308 Patent, identified as Exhibit 8 in the Complaint;
13. One (1) certified copy of the assignment for the ’090 Patent, identified as Exhibit 9 in the Complaint;
14. One (1) certified copy of the assignment for the ’553 Patent, identified as Exhibit 10 in the Complaint;
15. One (1) certified copy of the assignment for the ’233 Patent, identified as Exhibit 11 in the Complaint;
16. One (1) certified copy of the assignment for the ’924 Patent, identified as Exhibit 12 in the Complaint;
17. One (1) certified copy of the prosecution history of the ’490 patent, identified as Appendix A in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));

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18. One (1) certified copy of the prosecution history of the '308 patent, identified as Appendix B in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));
19. One (1) certified copy of the prosecution history of the '090 patent, identified as Appendix C in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));
20. One (1) certified copy of the prosecution history of the '553 patent, identified as Appendix D in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));
21. One (1) certified copy of the prosecution history of the '233 patent, identified as Appendix E in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));
22. One (1) certified copy of the prosecution history of the '924 patent, identified as Appendix F in the Complaint, and three (3) additional copies on separate CDs (Commission Rules 210.12(c)(1));
23. Four (4) copies of examiner-cited references identified in the prosecution histories of the asserted patents, identified as Appendices G through L in the Complaint, respectively (Commission Rule 210.12(c)(2)).
24. A letter of certification pursuant to Commission Rules 201.6(b) and 210.8(d) requesting confidential treatment of information appearing in Confidential Exhibits 40 and 106 to the Verified Complaint.

Three (3) physical samples of iRobot's domestic industry products, including one (1) Roomba 650, one (1) Roomba 860, and one (1) Roomba 980.

Respectfully submitted,



Ruffin B. Cordell

Counsel for iRobot Corporation

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Re: Certain Robotic Vacuum Cleaning Devices and Components Thereof Such as Spare
Parts, Inv. No. 337-TA-__

Dear Secretary Barton:

In accordance with 19 C.F.R. §§ 201.8(g) and 210.5, iRobot Corporation (“iRobot”) requests confidential treatment for the business information contained in Confidential Exhibits 40 and 106 to the Verified Complaint.

The information for which confidential treatment is sought is proprietary commercial information not otherwise publicly available. Specifically, Confidential Exhibit 40 contains information regarding licensing of the asserted patents, and Confidential Exhibit 106 contains proprietary information regarding Complainant’s domestic industry, including information relating to the financial performance and commercial operations of Complainant.

The information described above qualifies as confidential business information pursuant to Rule 201.6(a) because:

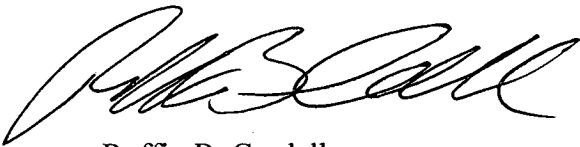
1. It is not publicly available;
2. Unauthorized disclosure of such information could cause substantial harm to the competitive position of iRobot;
3. The disclosure of such information could impair the Commission’s ability to obtain information necessary to perform its statutory function.

FISH.
FISH & RICHARDSON

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Please contact me if you have any questions about this request, or if this request is not granted in full.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ruffin B. Cordell', written in a cursive style.

Ruffin B. Cordell

Counsel for iRobot Corporation

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