



[REDACTED]

[REDACTED]



[REDACTED]

**INTERROGATORY NO. 15:**

Identify, for every invention claimed in the Patents-In-Suit:

- (1) the earliest date of conception;
- (2) the earliest date of reduction to practice;
- (3) any documents that you content to support or reflect the dates identified in (1) or (2);  
and
- (4) any individuals involved in (1) or (2) and include a description of their involvement.

**RESPONSE:**

Based on its investigation to date, OWT states that it does not presently intend to attempt to establish a priority date earlier than the date of any of the references identified in the headers of any of Tennant's invalidity claim charts (i.e. the headers for Exhibits 1-8 for the '665 and 092 patents, the headers for the chart for the '415 patent entitled "Litigation Invalidity Claim Chart for Reissued Patent U.S. RE45,451 (Senkiw)", and the headers for Exhibits 19 and 20). If there are additional alleged prior art references that are identified elsewhere in the claim charts that accompanied Tennant's invalidity contentions for which information responsive to this interrogatory is relevant, OWT will provide a response relevant to those references after Tennant identifies them to OWT. OWT reserves the right to supplement this interrogatory as discovery continues, particularly in light of any new positions taken by Tennant, any claim constructions the Court may enter, any expert analysis or discovery, any third party discovery, or any other information that comes to light as this case unfolds.

Beyond that, OWT objects that this interrogatory seeks information that is not relevant to any party's claims or defenses, not proportional, unduly burdensome, and unreasonably cumulative and duplicative. OWT objects to this interrogatory as containing discrete subparts and counting as more than one interrogatory. OWT objects to this interrogatory to the extent it seeks privileged or work product information, and OWT will withhold such information.

**SUPPLEMENTAL RESPONSE:**

OWT maintains all of its general and specific objections identified above. OWT further objects that an additional response to this interrogatory is unnecessary given that the particular dates of conception and reduction to practice are not relevant to any issue in this case.

Nevertheless, OWT will identify a date below. The date OWT identifies is based on the

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