

From: [McCauley, Robert](#)
To: [Milunski, Sarah A.](#); [Bhattacharyya, Arpita](#); [Carron, Virginia](#)
Cc: [Walsh, Richard B., Jr.](#); [Hickey, Michael J.](#); [Selburn, Gail](#)
Subject: [EXTERNAL] RE: SRAM, LLC v. Fox Factory, Inc.
Date: Friday, March 15, 2024 4:15:55 PM

Dear Sarah,

Apologies for not responding to your email sooner than today. Today FOX will be producing engineering drawings, detailed sales spreadsheets, marketing and other documents in response to SRAM's document requests. FOX also served supplemental responses to SRAM's interrogatories last June. I am not available on Monday, but am available on Tuesday afternoon to discuss SRAM's discovery requests.

Best,

Rob

Robert McCauley

Partner

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From: Milunski, Sarah A. <SMilunski@lewisrice.com>
Sent: Friday, March 15, 2024 1:36 PM
To: McCauley, Robert <Robert.McCauley@finnegan.com>; Bhattacharyya, Arpita <Arpita.Bhattacharyya@finnegan.com>; Carron, Virginia <Virginia.Carron@finnegan.com>
Cc: Walsh, Richard B., Jr. <RWalsh@lewisrice.com>; Hickey, Michael J. <MHickey@lewisrice.com>
Subject: RE: SRAM, LLC v. Fox Factory, Inc.

Counsel,

I emailed you over a week ago regarding Fox's overdue discovery responses in the Georgia litigation but have not received any response to date. Please either produce the requested substantive answers to SRAM's interrogatories and Fox's document production by no later than Monday or let me know when you are available to meet and confer on Monday during business hours (EST since that is the time zone for where that case is pending).

Sarah



Sarah A. Milunski

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From: Milunski, Sarah A. <SMilunski@lewisrice.com>
Sent: Thursday, March 7, 2024 8:43 AM
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Cc: Walsh, Richard B., Jr. <RWalsh@lewisrice.com>; Hickey, Michael J. <MHickey@lewisrice.com>
Subject: SRAM, LLC v. Fox Factory, Inc.

Counsel,

As you know, SRAM previously served discovery requests in this matter on April 17, 2023 and August 31, 2023. Fox did not respond to the discovery in the required time frame. When we brought this to your attention, Fox refused to provide substantive answers or responses in light of the Court's Scheduling Order, ECF No. 27, holding aside discovery pending the Court's ruling on Fox's Transfer Motion. With the issuance of the Court's ruling denying Fox's Motion to Transfer, Fox needs to produce the discovery responses. Given the short timeframe for discovery and the fact that Fox has now had nearly a year to gather the materials requested, please confirm that Fox will provide substantive answers to SRAM's interrogatories and Fox's document production within 10 days.

We also need to simultaneously exchange a list of claim terms for construction and, given that the time to do so under the local rules passed during the time period the case was stayed, would propose we do so by no later than March 20.

Sarah



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