

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

SAMER AL-AZEM and
PETROHAB LLC,

Plaintiffs,

v.

SAFE ARC TECHNOLOGY, L.L.C.,

Defendant.

* C.A. No. 25-CV-417
*
* JUDGE ROBERT R. SUMMERHAYS
*
* MAGISTRATE JUDGE DAVID J. AYO
*
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* **PATENT CASE**
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**DEFENDANT SAFE ARC TECHNOLOGY, L.L.C.'S RESPONSES
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to the Federal Rules of Civil Procedure, Defendant, SAFE ARC TECHNOLOGY, L.L.C. ("Defendant") responds to SAMER AL-AZEM and PETROHAB, LLC's First Set of Interrogatories as follows:

GENERAL OBJECTIONS

1. Defendant objects to any definition, instruction, and/or request that contradicts, is inconsistent with, or imposes upon Defendant a greater burden than that required by the Federal Rules of Civil Procedure.

2. Defendant objects to these discovery requests to the extent they purport to require Defendant to provide information regarding other individuals or entities that are not parties to this litigation, or to search files and records that are not in its possession, custody or control. The Response to any discovery request or production of documents by Defendant shall not be deemed to be any admission or acknowledgement of any connection to, or liability of, any non-parties to this litigation.

3. Defendant objects to these discovery requests to the extent they call for documents or information subject to the attorney/client privilege and/or work product doctrine, or which were prepared in anticipation of litigation, are subject to a confidentiality agreement and/or are in any other way protected against disclosure. Defendant specifically objects to, without limitation, discovery seeking the disclosure of any Defendant's net worth and/or profit and loss information and/or documents as irrelevant, confidential, sensitive, proprietary and disproportionate to the needs of the case, among other objections. To the extent that any specific discovery request seeks privileged or otherwise non-discoverable information, this objection will apply to those requests without reiteration below. Documentation and/or information withheld on the grounds of privilege will be identified as needed in a Privilege Log.

**RESPONSES AND OBJECTIONS TO
FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 1:

State the date on which Safe Arc first became aware of U.S. Patent No. 9,545,775 and describe the facts and circumstances giving rise to such awareness including an identification of the three individuals most knowledgeable of such awareness.

RESPONSE TO INTERROGATORY NO. 1:

Objection. Defendant objects to this discovery request on the basis that Safe Arc has filed a Motion to Stay the captioned litigation due to the *inter partes* review ("IPR") petition filed by Safe Arc with the United States Patent and Trademark Office's Patent Trial and Appeal Board ("PTAB") seeking to invalidate U.S. Patent No. 9,545,775. The Motion to Stay is currently pending; in the event that the stay is granted, then discovery in this action will be stayed as well. Defendant further objects to this discovery request on the basis that the information sought to be

discovered includes confidential and proprietary information of a sensitive nature. Subject to the aforementioned objections, and without waiving same, Safe Arc responds that it will supplement its response to this interrogatory ten (10) days following issuance of a final non-appealable judgment denying its Motion to Stay in this matter.

INTERROGATORY NO. 2:

Has Safe Arc possessed, inspected, visually recorded, or reverse engineered any soft-sided modular panels sold by Petro-Hab? If so, for each such panel, state the date on which Safe Arc engaged in any such activity, describe the facts and circumstances constituting such activity, and provide the names of the three individuals most knowledgeable of such activity.

RESPONSE TO INTERROGATORY NO. 2:

Objection. Defendant objects to this discovery request on the basis that Safe Arc has filed a Motion to Stay the captioned litigation due to the *inter partes* review (“IPR”) petition filed by Safe Arc with the United States Patent and Trademark Office’s Patent Trial and Appeal Board (“PTAB”) seeking to invalidate U.S. Patent No. 9,545,775. The Motion to Stay is currently pending; in the event that the stay is granted, then discovery in this action will be stayed as well. Subject to the aforementioned objections, and without waiving same, Safe Arc responds that it will supplement its response to this interrogatory ten (10) days following issuance of a final non-appealable judgment denying its Motion to Stay in this matter.

Respectfully submitted:

s/Ted M. Anthony

Ted M. Anthony, LA #21446 (T.A.)
Sarah B. Dupont, LA #35048
BABINEAUX, POCHÉ, ANTHONY
& SLAVICH, L.L.C.
P. O. Box 52169
Lafayette, LA 70505-2169
Telephone: (337) 984-2505
Fax: (337) 984-2503
Email: tanthony@bpasfirm.com
sdupont@bpasfirm.com

and

BUNSOW DE MORY LLP

s/Wayne M. Helge

WAYNE M. HELGE
JAMES WILSON
277 s. Washington St., Suite 210, #1088
Alexandria, VA 22314
Telephone: (571) 208-0186
Fax: (415) 426-4744
Email : whelge@bdiplaw.com
jwilson@bdiplaw.com

ATTORNEYS FOR DEFENDANT
SAFE ARC TECHNOLOGY, L.L.C.

CERTIFICATE

I hereby certify that a copy of the above and foregoing has this date been served upon all counsel of record in this proceeding by:

☐ Hand Delivery	☐ Prepaid U.S. Mail
☐ Facsimile	☐ Federal Express
☐ Certified Mail	☒ E-mail

Lafayette, Louisiana, this 6th day of August, 2025.

s/Ted M. Anthony
Ted M. Anthony