

PUBLIC VERSION

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ZODIAC POOL SYSTEMS LLC and
ZODIAC POOL CARE EUROPE,

Plaintiffs,

v.

WYBOTICS, CO. LTD. f/k/a Tianjin
Wangyuan Environmental Protection and
Technology Co., Ltd.,

Defendant.

Case No. 2:25-cv-582-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFFS' FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES
TO DEFENDANT WYBOTICS, CO. LTD.'S
FIRST SET OF INTERROGATORIES (NOS. 1-24)**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY NO. 10:

Separately for each of the Asserted Claims, explain in detail the complete basis for Your contention that the Asserted Claim is not invalid under 35 U.S.C. § 102, and identify all documents and things supporting, tending to support, contradicting, tending to contradict, or otherwise relating to Your contention.

RESPONSE TO INTERROGATORY NO. 10

In addition to its General Objections, which Zodiac incorporates herein by reference, Zodiac objects to this Interrogatory to the extent it seeks the disclosure of information, or the identity of documents or communications protected by the attorney-client privilege, work-product exemption, and/or any other applicable privilege or immunity. Zodiac objects to this Interrogatory as it is overly broad, unduly burdensome, and/or seeks disclosure or production of information, documents, materials, or things that are not relevant to any claim or defense in this litigation and/or is not proportional to the needs of the case to the extent it requires Zodiac, at the outset of discovery, to marshal all the evidence on which it intends to rely. Zodiac objects to this Interrogatory as premature to the extent that it calls for contentions, expert discovery, and disclosure of expert opinions. Zodiac will provide its contentions, expert discovery, and disclosure of expert opinions in accordance with the Local Rules of the Eastern District of Texas, the Patent

Discovery in this case is ongoing and Zodiac reserves the right to amend and/or supplement

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10 (March 19, 2026):

Zodiac further objects to this Interrogatory as it is overly broad, unduly burdensome, and/or

[REDACTED]

to any claim or defense in this litigation and/or is not proportional to the needs of the case to the extent it requires Zodiac, at the outset of discovery, to disclose contentions regarding issues that may become moot. Wybotics has filed stipulations with the Patent Trial and Appeal Board (“PTAB”) stating that “Wybotics will not pursue invalidity grounds with respect to the challenged claims under 35. U.S.C. §§ 102 or 103” in this case should Wybotics’ petition for *inter partes* review should Wybotics’ petitions be instituted. Zodiac further objects to this Interrogatory as premature to the extent it seeks Zodiac’s validity contentions prior to the Court’s claim construction ruling and prior to disclosure of expert reports. *See, e.g., Mirror Worlds Techs., LLC v. Apple Inc.*, No. 6:13-CV-419, Dkt. 252 at 2–3 (E.D. Tex. Dec. 3, 2014) (finding “it would be premature at this time to compel an response to all 24 of Microsoft’s prior art charts” and acknowledging that validity interrogatories “place a larger burden” on patent owner than infringement contentions); *SFA Systems, LLC v. Amazon.com, Inc. et al.*, No. 6:11-CV-52, Dkt. 400 at 2–3 (E.D. Tex. Apr. 11, 2013) (denying a motion to compel validity contentions without prejudice to re-raising the motion after expert reports had been disclosed).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Discovery in this case is ongoing, and Zodiac reserves the right to amend and/or supplement its Response to this interrogatory.

[REDACTED]

[REDACTED]

[REDACTED]

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Dated: March 19, 2026

Respectfully submitted,

/s/ Steven D. Moore

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*Attorneys for Zodiac Pool Systems LLC and Zodiac
Pool Care Europe*

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2026, the foregoing document was served upon counsel of record for Defendants via email.

/s/ Steven D. Moore