

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

HOLLEY PERFORMANCE	)	
PRODUCTS INC.,	)	
	)	
Plaintiff and Counter-Defendant,	)	Case No. 1:26-cv-59-CEA-CHS
	)	
v.	)	
	)	
ACES FUEL INJECTION, INC.,	)	
	)	
Defendant and Counter-Plaintiff.	)	

**ACES FUEL INJECTION, INC.'S FIRST REQUEST FOR PRODUCTION
TO HOLLEY PERFORMANCE PRODUCTS, INC.**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant/Counter-Plaintiff Aces Fuel Injection, Inc. ("Aces"), by and through its undersigned attorneys, hereby serves its First Request for Production upon Plaintiff/Counter-Defendant Holley Performance Products Inc. ("Holley"). Aces requests that Holley produce or make available for inspection and/or copying the following documents, electronically stored information, and tangible things within thirty (30) days of service hereof. These document requests are continuing in nature and require further and supplemental responses as provided by Fed. R. Civ. P. 26.

INSTRUCTIONS

1. These Requests cover all documents and other tangible things in your possession, custody, or control, wherever located, including documents and other tangible things in the possession of representatives, subcontractors, officers, employees, agents, investigators, contractors, attorneys, or other persons directly or indirectly employed or retained by you, or anyone else acting on your behalf or otherwise subject to your control. These Requests shall be deemed continuing requests, and you shall produce any supplemental materials of

the nature sought herein that you obtain, directly or indirectly, or to which you gain access, following any production in response to these Requests.

2. In responding to the Requests, you should consult every potential source of documents and other tangible things in your possession or control, or to which you have access, including documents and other tangible things in the possession of your experts, consultants, and agents.
3. Items produced in response to these Requests should be organized or labeled to indicate the Request to which such items are responsive.
4. Where anything has been deleted or redacted from a document produced in response to a Request:
 - a. Specify the nature of the material deleted or redacted;
 - b. Specify the reason for the deletion or redaction;
 - c. Identify the person responsible for the deletion; and
 - d. Indicate on the document where material has been deleted.
5. If any material responsive to any of these Requests was, but is no longer, in your possession or custody or subject to your control, provide the following information for each such item:
 - a. Identify and describe the material;
 - b. Specify whether such material is missing, lost, destroyed or otherwise disposed, or in the possession, custody, or control of another;
 - c. State the date of such loss, destruction, disposal, or other disposition of material;
 - d. Explain the circumstances of such loss, destruction, disposal, or other disposition of material; and

- e. Identify the persons who authorized or have knowledge of such loss, destruction, disposal, or other disposition of material.
6. If any item (or portion of an item) is withheld from production pursuant to a claim of privilege, identify such item (or portion thereof) as privileged and state the legal and factual basis for the claim of privilege according to the privilege log parameters agreed by the parties.
7. If an objection is made to any Request or portion of a Request, identify the Request or portion thereof to which an objection is made, state the basis of the objection, and produce all items responsive to the non-objectionable portion of the Request.

DEFINITIONS

This discovery is governed by the following general definitions:

And/Or:

The conjunctions "and," "or," and "and/or" shall be interpreted in every instance both conjunctively and disjunctively, and shall never be interpreted so as to exclude any information otherwise within the scope of a request.

Any/All:

The word "all" shall be deemed to include and encompass the words "each," "every," and "any," and vice versa.

Disjunctive/Conjunctive:

The use of the disjunctive shall include the conjunctive, and vice versa.

Document:

The term "document" means all written, printed, or graphic matter of every kind or description, however produced or reproduced, whether original or reproduction, signed or unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed, and

includes, but is not limited to, all paper material of any kind, whether written, typed, printed, punched, filmed, or marked in any way, and all mechanical or electronic audio or video recordings or transcripts thereof.

"Document" includes, but is not limited to, letters, correspondence, memoranda, handwritten notes, written communications, interoffice communications, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, telephone bills, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of experts or consultants, messages, telegrams, telex messages, websites, brochures, catalogs, newsletters, diaries, journals, desk calendars, pocket calendars, appointment books, minutes, books, records, reports, studies, charts, graphs, ledgers, invoices, bills, receipts, checks, checkbooks, canceled checks, logs, worksheets, work papers, tax returns, computer printouts, prospectuses, financial statements, schedules, accounting or other work papers, expense account records, product and/or service schedules, territorial maps, financial records and statements, affidavits, written statements, summaries, contracts, agreements, purchase or sale orders, requisitions, client lists, product lists, customer accounts, transcripts, statistical records, surveys, magazine or newspaper articles, designs, layouts, drawings, sketches, diagrams, photographs, film, slides, motion pictures, videos, digital images, computer disks, microfiche, microfilm, recording tape, and information contained in any computer database, in computer hardware or software, or contained in any data storage device such as compact disk, CD Rom, DVD, floppy disk, zip drive, etc.

"Document" also specifically refers to any e-mail or other electronically stored data, whether or not reduced to tangible form, on magnetic or optical storage media, including, but not limited to:

- (a) all "active," "deleted," "residual," or "archive" files,
- (b) all electronic information, such as "metadata," hidden "post-it notes," document history and activity records, formulae used to calculate fields in spreadsheets, hidden columns or fields in spreadsheets or databases, or other hidden characters or values, which do/does not appear on the hardcopy printouts, and
- (c) all electronic file fragments or files that have been deleted and partially overwritten with new data.

"Document" also means all drafts and all copies of documents by whatever means made if the copy bears any other marking or notation. If a document has been prepared and several copies or additional copies have been made that are non-identical (or are no longer identical by reason of any subsequent additions or notations or other modifications of such copies), each non-identical copy is to be construed as a separate "document."

Evidencing:

The word "evidencing" shall be construed in its broadest sense which shall mean directly, indirectly, circumstantially, inferentially, or otherwise having any tendency to prove (i.e., make more or less probable) the proposition, topic or subject in question, either in whole or in part.

Identify:

The word "identify" means that with respect to a document, set forth the following information: a general description thereof (e.g., letter, memorandum, report, etc.); a brief summary of its contents, or a description of the subject matter it concerns; the name and address of the persons who drafted, prepared, compiled, or signed it; and any other descriptive information necessary in order to adequately describe it in a subpoena duces tecum or in a motion or request for production thereof. With regard to a person, the term "identify" means set forth the person's name, occupation, and last known home and work address, telephone number and email address.

Masculine/Feminine/Neuter:

The masculine gender shall also include the feminine and neuter genders. Any reference to any gender shall include all other genders.

Person:

The term "person(s)" refers to any individual person (whether living or deceased), partnership, firm, corporation, association, joint venture, or other entity.

Refer(ring)/Relat(e/ing) to:

The terms "refer to," "referring to," "relate to," and "relating to" shall be construed in their broadest sense and shall mean directly or indirectly describing, setting forth, discussing, mentioning, commenting upon, supporting, contradicting, or referring to the subject or topic in question, either in whole or in part. A document or communication "refers to" or "relates to" a given subject matter if that document or communication constitutes, embodies, comprises, reflects, identifies, states, deals with, comments on, responds to, describes, analyzes, contains information concerning, or is in any way pertinent to the subject matter. "Relating to" means and includes "constituting," "referring to," "pertaining to," "evidencing," "reflecting," "describing," or "has anything to do with," and in each instance, directly or indirectly. These terms mean, without limitation, any reference or relationship which either (a) provides information with respect to the subject of inquiry, or (b) might lead to individuals who, or documents which, might possess or contain information with respect to the subject of inquiry.

Singular/Plural:

The singular shall include the plural, and vice versa.

Thing/Things:

The term "Thing" or "Things" refers to "Things" within Fed. R. Civ. P. 34 in its broadest sense including without limitation physical objects other than Documents.

SPECIFIC DEFINITIONS

"'515 Patent" refers to U.S. Patent No. 11,118,515 titled "Electronic Fuel Injection Throttle Body Assembly."

"'083 Patent" refers to U.S. Patent No. 11,333,083 titled "Electronic Fuel Injection Throttle Body Assembly."

"'894 Patent" refers to U.S. Patent No. 11,409,894 titled "Fuel Injection Throttle Body."

"'434 Patent" refers to U.S. Patent No. 12,203,434 titled "Fuel Injection Throttle Body."

"'475 Patent" means U.S. Patent No. 7,735,475 titled "Fuel Injection Body Sized to Replace Carburetor Body" and includes without limitation all published applications related to the '475 Patent, including without limitation No. 2009/0145406.

"Holley Patents-in-Suit" refers to the '515 Patent, '083 Patent, '894 Patent and the '434 Patent collectively.

"You", "Your" and **"Holley"** refer to the Plaintiff/Counter-Defendant, Holley Performance Products Inc., and includes any parent, subsidiary, division, joint venture, affiliate, related company or other legal entity that is owned or controlled in whole or in part by Plaintiff/Counter-Defendant, and any agents, employees, officers, directors, owners and/or others acting on behalf of Plaintiff/Counter-Defendant or any such entities.

"Aces," "Defendant," and **"Counter-Plaintiff"** means Aces Fuel Injection, Inc.

"Third Party" or **"Third Parties"** means persons who are not parties to the Lawsuit.

"Lawsuit" means *Holley Performance Products Inc., v. Aces Fuel Injection, Inc.*, No. 1:26-cv-59-CEA-CHS, pending in the United States District Court for the Eastern District of Tennessee.

"Accused Aces Product(s)" means the Killshot Series, Royal Flush Series, the Deuces Wild Series and any other product, system, assembly, device, component, software, firmware, or

combination thereof that Holley contends infringes, directly or indirectly, any claim of any Patent-in-Suit.

"Holley Manual" refers to the TERMINATOR X and TERMINATOR X MAX MPFI fuel Injection System Installation & Tuning Manual, including all versions, revisions, drafts, updates, supplements, derivative works, and materials associated with U.S. Copyright Registration No. TX 9-500-485.

"Patented Holley Product(s)" means any product, system, assembly, device, component, software, firmware, or combination thereof that Holley contends practices, embodies, incorporates, or has incorporated any claim of any Patent-in-Suit, whether currently or formerly manufactured, used, offered for sale, sold, imported, licensed, marketed, or distributed by Holley.

"Accused Holley Products" means the products accused by Aces of infringing the '475 Patent, including without limitation the Holley Sniper EFI, Sniper 2 EFI, Terminator X Stealth, Atomic EFI, and any other product that Aces contends infringes the '475 Patent.

"Related Patents and Applications" means all patents, patent applications, continuations, continuations-in-part, divisionals, provisionals, reissues, reexaminations, foreign counterparts, foreign applications, and patents claiming priority to, sharing priority with, or otherwise related to any Patent-in-Suit or the '475 Patent.

REQUESTS FOR PRODUCTION

REQUEST NO. 1: Produce all Documents sufficient to establish Holley's ownership of the Holley Patents-in-Suit, including assignments, invention assignment agreements, transfers, mergers, acquisitions, licenses, and chain-of-title documents.

RESPONSE:

REQUEST NO. 2: Produce all Documents concerning any challenge, dispute, question, or analysis regarding ownership, inventorship, standing, enforceability, or title to any Holley Patent-in-Suit.

RESPONSE:

REQUEST NO. 3: Produce the complete prosecution files for the Holley Patents-in-Suit to the extent not publicly available, including inventor communications provided to prosecutors, invention disclosures, and prosecution-related analyses.

RESPONSE:

REQUEST NO. 4: Produce all Documents identifying each person involved in the conception, reduction to practice, development, design, prosecution, or commercialization of any invention claimed in the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 5: Produce all communications with any named inventor of the Holley Patents-in-Suit concerning the subject matter of the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 6: Produce all Documents relating to or reflecting the identity of persons involved in the prosecution of the Holley Patents-In-Suit.

RESPONSE:

REQUEST NO. 7: Produce all organizational charts, reporting structures, or Documents and Things sufficient to identify the job titles, responsibilities, and reporting relationships of all persons involved in the conception, reduction to practice, development, prosecution, or commercialization of the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 8: Produce all Documents relating to the assignment of the Holley Patents-In-Suit to Holley, including but not limited to communications relating to the decision to assign and the motivations to assign.

RESPONSE:

REQUEST NO. 9: Produce for inspection and testing one physical sample of each Patented Holley Product currently in Holley's possession, custody, or control.

RESPONSE:

REQUEST NO. 10: Produce Documents and Things sufficient to identify all Patented Holley Products.

RESPONSE:

REQUEST NO. 11: Produce all technical specifications, engineering specifications, design specifications, product requirements documents, and product architecture Documents and Things for the Patented Holley Products.

RESPONSE:

REQUEST NO. 12: Produce all design history files, engineering change orders, revision histories, change logs, redesign records, and engineering modifications relating to the Patented Holley Products.

RESPONSE:

REQUEST NO. 13: Produce all Documents, data, and communications relating to the structure, architecture, manufacture, functionality, and operation of the Patented Holley Products.

RESPONSE:

REQUEST NO. 14: Produce all testing, validation, quality-control, reliability, durability, performance, and verification Documents relating to the Patented Holley Products.

RESPONSE:

REQUEST NO. 15: Produce all manuals, installation instructions, service literature, engineering drawings, CAD files, schematics, photographs, renderings, product literature and all other Documents and Things relating to the Patented Holley Products.

RESPONSE:

REQUEST NO. 16: Produce all Documents and Things concerning design alternatives, alternative configurations, alternative architectures, alternative components, revised designs, design tradeoffs, or design proposals considered during the development of the Patented Holley Products.

RESPONSE:

REQUEST NO. 17: Produce all Documents and Things identifying the date of first offer for sale, first sale, first commercial release, and first public use of each product identified in response to Request No. 16.

RESPONSE:

REQUEST NO. 18: Produce all Documents and Things reflecting patent marking on any product, packaging, label, insert, manual, website, advertisement, or promotional material relating to any Patented Holley Product or Holley Patent-in-Suit prior to February 11, 2026.

RESPONSE:

REQUEST NO. 19: Produce all audits, reviews, investigations, assessments, analyses, studies, or communications concerning your compliance prior to February 11, 2026 with 35 U.S.C. § 287 relative to marking Patented Holley Products.

RESPONSE:

REQUEST NO. 20: Produce all Documents concerning any decision not to mark any Holley product with the patent number of any Holley Patent-in-Suit.

RESPONSE:

REQUEST NO. 21: Produce all Documents supporting Holley's contention that Accused Aces Products infringe any claim of any Holley Patent-in-Suit.

RESPONSE:

REQUEST NO. 22: Produce all photographs, videos, inspections, measurements, testing results, reverse-engineering reports, technical examinations and related Documents and Things of the Accused Aces Products.

RESPONSE:

REQUEST NO. 23: Produce all communications with third parties concerning alleged infringement of any Holley Patent-in-Suit by any Aces product.

RESPONSE:

REQUEST NO. 24: Produce all Documents supporting Holley's contention that any infringement by Aces of any Holley Patent-in-Suit was willful.

RESPONSE:

REQUEST NO. 25: Produce all non-privileged Documents referring or relating to Aces, any Accused Aces Product, or any current or former employee, officer, director, consultant, inventor, contractor or representative of Aces from January 1, 2022 to the present.

RESPONSE:

REQUEST NO. 26: Produce all competitive analyses, benchmarking reports, product comparisons, market analyses, "teardown" reports, reverse-engineering reports, or competitive intelligence concerning Aces or any Accused Aces Product from January 1, 2022 to the present.

RESPONSE:

REQUEST NO. 27: Produce all Documents and Things relating to competition and market share involving Holley and Aces in the EFI market from January 1, 2022 to the present.

RESPONSE:

REQUEST NO. 28: Produce all Documents and Things concerning the '475 Patent, including without limitation Holley's awareness, review, evaluation, analysis, consideration, or discussion of the '475 Patent, Documents that relate to the disclosure, sale or transfer, or offer to sell or transfer the invention claimed in the '475 Patent prior to the filing date of the '475 Patent, and/or concerning the '475 Patent or U.S. Patent Publication No. 2009/0145406 cited during prosecution of any Holley Patent-in-Suit or Related Patents and Applications.

RESPONSE:

REQUEST NO. 29: Produce all freedom-to-operate analyses, patent-clearance investigations, infringement analyses, patent-risk assessments, or similar analyses concerning the '475 Patent.

RESPONSE:

REQUEST NO. 30: Produce all communications concerning whether any Accused Holley Product or any other Holley product practices, embodies, or potentially infringes the '475 Patent.

RESPONSE:

REQUEST NO. 31: Produce all prior-art searches, patentability searches, novelty searches, validity analyses, and prior-art investigations relating to the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 32: Produce all Documents and Things concerning or discussing patents or other publications of Kenneth William Farrell, Michael Anthony Wittkopf, Marvin V. Benoit, or any other prior art considered, identified, analyzed, or relied upon with respect to the Holley Patents-in-Suit or Related Patents and Applications.

RESPONSE:

REQUEST NO. 33: Produce all Documents and Things concerning the validity, enforceability, patentability, or scope of the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 34: Produce all Documents and Things supporting any contention that the Holley Patents-in-Suit are valid and enforceable.

RESPONSE:

REQUEST NO. 35: Produce all Documents and Things referring or relating to the profitability, commercial success, and/or current popularity of any Patented Holley Product.

RESPONSE:

REQUEST NO. 36: Produce all Documents and Things concerning praise, recognition, awards, accolades, endorsements, industry acceptance, reviews, or favorable commentary concerning the Holley Patents-in-Suit or any Patented Holley Product.

RESPONSE:

REQUEST NO. 37: Produce all Documents and Things concerning any long-felt but unmet need allegedly addressed by the inventions claimed in the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 38: Produce all Documents and Things concerning alleged failures of others to solve any problem purportedly addressed by the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 39: Produce all Documents and Things concerning alleged copying of any invention claimed in the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 40: Produce all Documents and Things concerning the existence or absence of acceptable non-infringing alternatives to the inventions claimed in the Holley Patents-in-Suit.

RESPONSE:

REQUEST NO. 41: Produce all Documents and Things supporting any claim for damages in the Lawsuit.

RESPONSE:

REQUEST NO. 42: Produce all Documents and Things concerning any *Georgia-Pacific* factor on which Holley intends to rely relative to a claim for damages.

RESPONSE:

REQUEST NO. 43: Produce all Documents and Things concerning alleged lost sales, lost customers, lost opportunities, lost market share, price erosion, convoyed sales, or lost profits attributable to Accused Aces Products.

RESPONSE:

REQUEST NO. 44: Produce all Documents identifying monthly unit sales, monthly revenue, and monthly gross profit for each Accused Holley Product sold in the United States from March 6, 2020 through the present.

RESPONSE:

REQUEST NO. 45: Produce all profit-and-loss statements, sales reports, revenue reports, profitability reports and financial summaries concerning the Accused Holley Products from March 6, 2020 through the present.

RESPONSE:

REQUEST NO. 46: Produce all distribution agreements, reseller agreements, dealer agreements, channel-partner agreements, and similar agreements relating to the Patented Holley Products or Accused Holley Products.

RESPONSE:

REQUEST NO. 47: Produce all customer reviews, customer surveys, customer feedback, testimonials, complaint records, and market research concerning the Patented Holley Products or Accused Holley Products.

RESPONSE:

REQUEST NO. 48: Produce all Documents concerning market share, market penetration, competitive position, or competitive ranking of the Patented Holley Products or Accused Holley Products.

RESPONSE:

REQUEST NO. 49: Produce all license agreements, covenant-not-to-sue agreements, settlement agreements, term sheets, licensing negotiations, licensing analyses, payments, royalties, fees, compensations, or other financial benefits paid or promised relating to the Holley Patents-in-Suit or any Related Patents and Applications.

RESPONSE:

REQUEST NO. 50: Produce all pleadings, expert reports, discovery responses, settlement agreements, judgments, arbitration awards, or administrative decisions relating to any litigation, arbitration, mediation, or proceeding involving the Holley Patents-in-Suit, the '475 Patent, or any Related Patents and Applications from March 6, 2020 through the present.

RESPONSE:

REQUEST NO. 51: Produce all Documents and Things concerning the creation, drafting, development, authorship, editing, revision, or updating of the Holley Manual.

RESPONSE:

REQUEST NO. 52: Produce all Documents concerning ownership of the copyright in the Holley Manual, including without limitation registrations, applications, assignments, employment agreements, work-for-hire agreements, licenses, and transfers.

RESPONSE:

REQUEST NO. 53: Produce all Documents and Things concerning the source materials used to create the Holley Manual, including prior manuals, technical documents, reference materials, third-party materials, templates, and predecessor publications.

RESPONSE:

REQUEST NO. 54: Produce all Documents and Things supporting Holley's contention that the Holley Manual contains protectable original expression allegedly infringed by Aces, and all Documents concerning damages or other relief sought for the alleged copyright infringement.

RESPONSE:

REQUEST NO. 55: Produce all of Holley's document-retention policies, records-management policies, ESI-retention policies, and data-preservation policies in effect from January 1, 2020, through the present.

RESPONSE:

REQUEST NO. 56: Produce all of Holley's litigation-hold notices, preservation notices, preservation memoranda, and preservation instructions concerning the claims or defenses in the Lawsuit.

RESPONSE:

REQUEST NO. 57: Produce all Documents concerning the preservation, deletion, destruction, loss, overwriting, migration, replacement, or recovery of documents or electronically stored information potentially relevant or discoverable in this case.

RESPONSE:

REQUEST NO. 58: Produce all Documents and Things concerning the recruitment, hiring, retention, engagement, duties, responsibilities, compensation, or separation of Warren Duff in relation to Holley.

RESPONSE:

REQUEST NO. 59: Produce all communications between Holley and Warren Duff occurring before the commencement of his employment or engagement with Holley.

RESPONSE:

REQUEST NO. 60: Produce all communications between Warren Duff and any Holley employee, officer, director, inventor, engineer, patent prosecutor, consultant, or agent concerning Aces, the '475 Patent, any Holley Patent-in-Suit, Patented Holley Product, or any Accused Holley Product.

RESPONSE:

REQUEST NO. 61: Produce all Documents and Things concerning information provided by Warren Duff to Holley or any third party regarding Aces, the '475 Patent, any Accused Holley Product or any throttle-body EFI products relevant to this Lawsuit.

RESPONSE:

REQUEST NO. 62: Produce all employment agreements, consulting agreements, confidentiality agreements, invention assignment agreements, non-disclosure agreements, non-competition agreements, separation agreements or any other agreements involving Warren Duff.

RESPONSE:

REQUEST NO. 63: Produce all Documents and Things concerning any investigation, analysis, discussion, or assessment relating to Warren Duff's prior work, inventions, patents, technical knowledge, activities connected to Aces, or involvement with the '475 Patent.

RESPONSE:

REQUEST NO. 64: Produce all Documents and Things concerning Warren Duff's involvement, if any, in the prosecution of any Holley Patent-in-Suit, evaluation of the '475 Patent, prior-art analyses concerning the '475 Patent, or assessments of potential infringement of the '475 Patent.

RESPONSE:

REQUEST NO. 65: Produce all Documents and Things relating to Moon's New Retro EFI that was the subject of a April 2004 article titled: "Ultimate Induction with Electric Fuel Injection," as Holley references in the subpoena to Ken Farrell.

RESPONSE:

REQUEST NO. 65: Produce all Documents and Things relating to Retrotek Speed, Professional Products, Brian Wald, Radical Concept Products, Inc., Wald Diversified Corporation, Quick Fuel Technologies, FiTech EFI, Fuel Injection Technology Inc., Kenneth W. Farrell, Injection Logic, or POWERJECTION™ technology.

RESPONSE:

REQUEST NO. 66: All Documents and Things that refer or relate to any use, disclosure, publication, sale, or offer to sell or transfer of any invention claimed in the '475 Patent on or before the date of application for the '475 Patent.

RESPONSE:

REQUEST NO. 67: All Documents and Things that refer or relate to EFI systems that were intended to replace carburetors before the date of application for the '475 Patent, including all physical embodiments and specimens of such systems.

RESPONSE:

This 4th day of September, 2026.

Respectfully submitted,

By: /s/ John G. Jackson

John G. Jackson, BPR No. 013840

Susie Lodico BPR No. 023754

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing pleading was served upon the following via electronic mail pursuant to Tenn. R. Civ. P. 5.02(2)(A) and/or United States first-class mail with proper postage applied thereon to ensure prompt delivery to:

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Attorneys for Plaintiff and Counter-Defendant

This 4th day of September 2026.

/s/ John G. Jackson
John G. Jackson