

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

**HOLLEY PERFORMANCE
PRODUCTS INC.**

Plaintiff and Counter-Defendant,
v.

ACES FUEL INJECTION, INC.

Defendant and Counter-Plaintiff.

Case No. 1:26-cv-00059-CEA-CHS

**HOLLEY PERFORMANCE PRODUCTS INC.’S FIRST
INTERROGATORIES TO ACES FUEL INJECTION, INC. (NOS. 1-
5)**

Pursuant to Fed. R. Civ. P. 26 and 33, Plaintiff/Counter-Defendant Holley Performance Products Inc. (“Holley”) requests that Defendant/Counter-Plaintiff Aces Fuel Injection, Inc. (“Aces”) answer the following interrogatories under oath within thirty days of service.

DEFINITIONS AND INSTRUCTIONS

1. “Holley” or “Plaintiff” or “You” or “Your” shall mean Holley Performance Products Inc., all of its predecessors (merged, acquired, or otherwise) and successors, and all of its present and former officers, directors, agents, representatives, employees, and other persons acting on its behalf.
2. “Aces” or “Defendant” shall refer to Aces Fuel Injection, Inc.
3. “Parties” shall refer to both “Holley” and “Aces.”
4. “Lawsuit” shall refer to the lawsuit captioned above brought by Holley by filing a Complaint in the Eastern District of Tennessee on March 6, 2026.
5. “Aces Accused Products” means the Killshot Fusion EFI System, the Deuces Wild 2-bbl EFI System, and any other product, system, assembly, device, component, software, firmware, or combination thereof that Holley contends infringes any claim of any of the Holley Patents-in-Suit.
6. “Holley Patents-in-Suit” means U.S. Patent No. 11,118,515; U.S. Patent No. 11,333,083; U.S. Patent No. 11,409,894; and U.S. Patent No. 12, 203,434, collectively.
7. “Holley Accused Products” means the products accused by Aces of infringing the ’475 Patent including the Holley Sniper EFI, Sniper 2 EFI, Terminator X, and/or Quadrajet EFI.
8. The “’475 Patent” means U.S. Patent No. 7,735,475.
9. “Marked” or “Marking” refers to the process described in 35 U.S.C. § 287(a) whereby a patent holder may give public notice that a product it sells is patented in the United States, by marking its product or labeling its product or the product's packaging with the patent number ("Physical Marking"), or by identifying a web address that associates the patented product with the patent number ("Virtual Marking").

10. “Document” or “Documents” is synonymous in meaning and equal in scope to its usage in Rule 34 of the Federal Rules of Civil Procedure in its broadest sense, including communications and electronically stored information (“ESI”).

11. “Thing” or “Things” refers is synonymous in meaning and equal in scope to its usage in Rule 34 of the Federal Rules of Civil Procedure in its broadest sense including without limitation physical objects other than Documents.

12. “Identify” when used with respect to a person shall mean to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment.

13. “Identify” when used with respect to an event or activity shall mean to give the date, participants and nature of the activity or event.

14. “Identify” when used with respect to documents shall mean to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; (iv) author(s), address(es) and recipient(s); and (v) Bates number(s) of the document, and to identify the present custodian of the document.

15. “Identify” when used with respect to things other than documents shall mean to give, to the extent known, a description of the thing requested, including any and all product names (both those used internally within Aces and those used externally in sales, marketing and other commercial activities), and any and all product numbers or codes related to such things and an explanation of each such number or code.

16. The terms “referring to,” “relating to” or “regarding” shall mean refers to, relates to, is relevant to, constitutes, comprises, contains, sets forth, proposes, explains, reflects, implies,

pertains to, alludes to, concerns, is connected with, involves, describes, supports, identifies, evidences, shows, is associated with, or in any way touches upon.

17. “All” shall mean “any and all” and the word “any” shall mean “any and all.”

18. “And” and “or” shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these interrogatories any information that would otherwise not be brought within their scope.

19. “Including” shall be construed to mean “including, but not limited to” and “without limitation.”

20. “Person(s)” shall mean any natural person, individual, firm, association, corporation, partnership, foundation, proprietorship, joint venture, organization, or entity, including all governmental entities, agencies, officers, and departments.

21. “Communications” shall mean any transmission, exchange, or transfer of information by any means, including nonverbal exchanges, letters, facsimiles, electronic mail, other computer linkups, written memoranda, and face-to-face conversations.

22. The use of any tense of any verb shall also include within its meaning all other tenses of that verb.

23. The singular shall include the plural, and the masculine gender shall include the feminine and gender neutral.

24. If, after responding, Aces obtains or becomes aware of any further information in response to Holley’s First Interrogatories, Aces is required to supplement its responses and provide Holley with such additional information in accordance with the requirements of Rule 26 of the Federal Rules of Civil Procedure.

INTERROGATORIES

INTERROGATORY NO. 1: Identify by model number and version each of the Aces Accused Products made, used, sold, offered for sale in, or imported into the United States, and for each model and version so-identified, state: (a) the quantity of units sold by month from date of first sale to the present; (b) the price at which each unit was sold; (c) the gross revenue earned from each sale; (d) the gross and net profits from each sale; (e) any rebates, discounts, or incentives offered in connection with each sale; (f) all costs or expenses incurred in the manufacture and sale of each unit; (g) the dates during which each model and version was made, used, sold, offered for sale in, or imported into the United States; and (h) the competitors in the relevant market, Aces' approximate market share, and the approximate overall dollar value size of the relevant market. Your response should include reference to all Documents and Things relied upon to provide answers to the inquiry above.

RESPONSE:

INTERROGATORY NO. 2: Describe all communications between Kenneth W. Farrell and Aces concerning the '475 Patent, any of the Holley Patents-in-Suit, any Accused Holley Product, Retrotek Speed, Professional Products, Brian Wald, Radical Concept Products, Inc., Wald Diversified Corporation, Quick Fuel Technologies, FiTech EFI, Fuel Injection Technology Inc., Injection Logic, or POWERJECTION™ technology and identify all Documents or Things in or on which such communications were recorded or memorialized.

RESPONSE:

INTERROGATORY NO. 3: Describe all investigations, analyses, or discussions relating to the validity, patentability, infringement, enforceability, ownership, or scope of the '475 Patent that occurred at any time prior to the filing date of this Lawsuit, including any prior art discussed, recognized or considered, and for each state the date, identify all persons involved, describe the subject matter and scope, the location (if a physical location), and identify any Documents and Things relating to each described investigation, analysis or discussion.

RESPONSE:

INTERROGATORY NO. 4: Identify each product that You contend practices any claim of the '475 Patent and for each such product, identify (a) which claim(s) of the '475 Patent it purportedly practices, (b) whether the product was Marked via Physical Marking or Virtual Marking; (c) the dates when such product was Marked and the dates when it was not Marked; (d) the manner of Marking each such product, e.g., whether on the product itself via label or tag, or on packaging or other material, and (e) the identity of the web address(es) identified with the word "Patent" or "Pat." in the product's Marking, and identify any Documents and Things related to each inquiry.

RESPONSE:

INTERROGATORY NO. 5: Describe the design and development of each product that is either an Aces Accused Product or product that you contend practices the '475 Patent, including without limitation relevant dates, identification of the role and employer of each participant, and locations where such design and development work took place, and identify any Documents and Things relating to each described design and development.

Dated: September 16, 2026

/s/ Marc Lorelli

Marc Lorelli (*Pro Hac Vice*)

John P. Rondini (*Pro Hac Vice*)

Yasmeen Moradshahi (*Pro Hac Vice*)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that I served:

**HOLLEY PERFORMANCE PRODUCTS INC.'S FIRST INTERROGATORIES TO ACES
FUEL INJECTION, INC. (NOS. 1-5)**

on September 16, 2026 by:

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/s/ Nicole L. Solomon