

**From:** [Mitterndorfer, Ericka](#)  
**To:** [Eric Huang](#); [QE-HarborFreight-Champion](#)  
**Cc:** [Byer, Ben](#); [Hunt, Sam](#); [Li, Xiang](#); [Chung, Jennifer](#); [Barker, David](#); [Schroeder, Zachary](#); [Tim Ziolkowski](#); [Jacob Fritz](#); [Robyn Templin](#); [godisho@swlaw.com](#); [Merritt, Lisa](#)  
**Subject:** RE: Harbor Freight Tools v. Champion Power Equipment / Subpoena to Firman Power Equipment, Inc.  
**Date:** Monday, March 24, 2025 6:11:25 PM

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Counsel,

The following documents are available at the FTP linked below. Your email address is your username, and I will provide your password separately.

- 2024.08.30 Firman's Invalidity Contentions
- 2024.08.30 Firman's Non-Infringement Contentions
- 2025.02.28 Firman's Amended Invalidity Contentions
- 2024.12.18 Champion's Proposed Claim Terms for Construction.pdf
- 2024.12.18 Firman\_Proposed Terms for Construction.pdf
- 2025.01.17 Champion\_Preliminary Proposed Constructions.pdf
- 2025.01.17 Firman\_Preliminary Claim Constructions and Evidence.pdf
- 2025.03.07 Firman\_Expert Declaration of Dr. Timothy Jacobs re Markman Issues.pdf
- 2025.03.14 Champion\_Singhose First Supplemental Claim Construction Expert Report.pdf
- 2025.03.07 Champion\_Expert Report of William Singhose, Ph.D. Re Claim Construction.pdf
- Firman\_003.zip (produced to Champion on 8/30/2025)
- Firman\_007.zip (produced to Champion on 1/23/2025)

<https://dwtlit.ftptoday.com/>

Please let me know if you have any questions.

Best regards,

Ericka

**Ericka Mitterndorfer** she/her  
Paralegal, Davis Wright Tremaine LLP

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**P** 206.757.8537 **C** 206.303.7311 **E** [erickamitterndorfer@dwt.com](mailto:erickamitterndorfer@dwt.com)  
**A** 920 5th Avenue, Suite 3300, Seattle, WA 98104-1610  
**DWT.COM**

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**From:** Merritt, Lisa <LisaMerritt@dwt.com>

**Sent:** Monday, March 24, 2025 2:56 PM

**To:** Eric Huang <erichuang@quinnemanuel.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

**Cc:** Byer, Ben <BenByer@dwt.com>; Hunt, Sam <SamHunt@dwt.com>; Li, Xiang <XiangLi@dwt.com>; Mitterndorfer, Ericka <ErickaMitterndorfer@dwt.com>; Chung, Jennifer <JenniferChung@dwt.com>; Barker, David <dbarker@swlaw.com>; Schroeder, Zachary <zschroeder@swlaw.com>; tjz@zpatents.com;

jmf@zpatents.com; rlt@zpatents.com; godisho@swlaw.com

**Subject:** Harbor Freight Tools v. Champion Power Equipment / Subpoena to Firman Power Equipment, Inc.

Dear Mr. Huang,

Attached is Ben Byer's letter of today's date regarding this matter. Should you have any questions, please contact Mr. Byer directly at 206.757.8105 or [benbyer@dwt.com](mailto:benbyer@dwt.com). Thank you.

Best regards,

Lisa

**Lisa Merritt**  
**Executive Legal Assistant, Davis Wright Tremaine LLP**

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**P** 206.757.8490 **E** [lisamerritt@dwt.com](mailto:lisamerritt@dwt.com)  
**A** 920 5th Avenue, Suite 3300, Seattle, WA 98104-1610  
**DWT.COM**