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18 *Tools USA, Inc.*

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

21 HARBOR FREIGHT TOOLS USA,
22 INC.,

23 Plaintiff,

24 vs.

25 CHAMPION POWER EQUIPMENT,
26 INC.,

27 Defendant.

Case No. 2:24-cv-08722-SVW-AS

**PLAINTIFF HARBOR FREIGHT
TOOLS USA, INC.'S OBJECTIONS
AND RESPONSES TO
DEFENDANT CHAMPION POWER
EQUIPMENT, INC.'S SECOND SET
OF INTERROGATORIES
(NOS. 7-15)**

Hon. Stephen V. Wilson

Hon. Alka Sagar

1 Pursuant to Federal Rules of Civil Procedure 26 and 33 and the applicable rules
2 of the United States District Court for the Central District of California, Harbor
3 Freight Tools USA, Inc. (“Harbor Freight,” “HFT,” or “Plaintiff”) hereby provides its
4 responses and objections to Defendant Champion Power Equipment, Inc.’s
5 (“Champion” or “Defendant”) Second Set of Interrogatories (the “Interrogatories”).
6 Pursuant to Federal Rule of Civil Procedure 26(e), HFT reserves the right to
7 supplement its responses to these Interrogatories as it deems necessary and
8 appropriate.

9 **GENERAL OBJECTIONS**

10 The following general objections apply to each and every Interrogatory
11 propounded by Champion and are incorporated into each of the responses by
12 reference as if set forth fully therein. A specific response may repeat a general
13 objection for emphasis or some other reason. The failure to include any general
14 objection in any specific response shall not constitute a waiver of any general
15 objection to that Interrogatory.

16 1. HFT objects to each Interrogatory to the extent it seeks to impose
17 requirements or obligations in addition to or different from those imposed by the
18 Federal Rules of Civil Procedure and/or the Local Civil Rules for the Central District
19 of California.

20 2. HFT objects to each Interrogatory to the extent it is not reasonably
21 calculated to lead to the discovery of admissible evidence, or is otherwise outside the
22 proper scope of discovery.

23 3. HFT objects to each Interrogatory to the extent it calls for information
24 that is protected from discovery by the attorney-client privilege, the attorney work-
25 product doctrine, and/or any other applicable privilege or immunity. Inadvertent
26 production of any such information shall not be deemed a waiver of any privilege or
27 immunity. Nothing contained in any of these responses is intended to be, or in any
28 way constitutes, a waiver of any such applicable privilege, immunity, or doctrine.

1 10. HFT objects to each Interrogatory to the extent it imposes on HFT an
2 obligation to investigate or discover information, materials, or documents from third
3 parties that are not within the possession, custody, or control of HFT.

4 11. HFT objects to Champion's definitions of "Harbor Freight," "Plaintiff,"
5 "you," and "your(s)" on the grounds that they are overly broad and includes persons
6 and entities over whom HFT has no control. These responses are made solely on
7 behalf of HFT as defined in HFT's First Set of Interrogatories to Champion.

8 12. HFT objects to Champion's definition of "relating to" to the extent it
9 seeks to place discovery obligations upon HFT that exceed those required by the
10 Federal Rules of Civil Procedure, the Local Rules of this Court, or this Court's orders.

11 13. HFT objects to Champion's definition of "including" to the extent it
12 seeks to place discovery obligations upon HFT that exceed those required by the
13 Federal Rules of Civil Procedure, the Local Rules of this Court, or this Court's orders.

14 14. HFT objects to Champion's definition of "Identify" to the extent it seeks
15 to place discovery obligations upon HFT that exceed those required by the Federal
16 Rules of Civil Procedure, the Local Rules of this Court, or this Court's orders.

17 15. HFT objects to the purported definition of the phrase "Describe in detail"
18 to the extent it is vague, ambiguous, overbroad, unduly burdensome, and seeks
19 information that is not relevant to any party's claim or defense and not proportional
20 to the needs of the case. HFT interprets the phrase "Describe in detail" in accordance
21 with its ordinary meaning.

22 16. HFT objects to each Interrogatory to the extent it seeks information that
23 may be readily ascertained from documents already in Champion's possession.

24 17. HFT objects to the purported definitions of the term "Accused Products"
25 to the extent it includes products not identified and charted in Champion's
26 infringement contentions, and therefore that are not relevant or within the scope of
27 this case. HFT further objects to the extent the breadth of the definition is not
28 proportional to the needs of the case. HFT will not provide evidence or responses

1 regarding products that are not accused in this case (e.g., products not identified by
2 product/model number in Champion’s operative infringement contentions, products
3 that were not sold, offered for sale, used, made, or imported into the United States
4 during the relevant time period).

5 18. HFT objects to the Interrogatories because they exceed the 25
6 interrogatory limit in the Federal Rules of Civil Procedure, when taking into account
7 the prior interrogatories Champion served, and discrete subparts. *See* Fed. R. Civ. P.
8 33(a)(1). By way of example, courts in this district have recognized that an
9 interrogatory has multiple discrete subparts for purposes of calculating the 25
10 interrogatory limit where the interrogatory seeks information regarding multiple
11 patents, *Grupo Bimbo S.A.B de C.V. v. Snak-King Corp.*, 2014 WL 12614429, at *2
12 (C.D. Cal. May 5, 2014) (“Hypothetically, if there were, for example, 12 patents at
13 issue in this case, it would be difficult to conceive that the party claiming infringement
14 could, in one interrogatory, seek information pertaining to asserted infringement
15 regarding all of the patents”); where the interrogatory seeks information regarding
16 multiple accused products, *Seoul Semiconductor Co., Ltd. v. FEIT Electric Co., Inc.*,
17 Case No. 2:22-cv-05097-AB-SHK, 2024 WL 3086641, at *6-7 (C.D. Cal. May 23,
18 2024) (finding at least 25 interrogatories where interrogatory sought information on
19 more than 25 accused products); or where the interrogatory seeks information on
20 multiple claim limitations, *Squaregles LLC v. Laltitude LLC*, 2025 WL 1720188, at
21 *3 (C.D. Cal. May 7, 2025) (finding nine interrogatories where the purported single
22 interrogatory sought information on nine claim limitations). Under this and other
23 authority, these Interrogatories exceed the 25 interrogatory limit by hundreds of
24 interrogatories.

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RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 7:

Identify the level of ordinary skill in the art you contend is applicable to the Asserted Patents, including in your response your factual basis for your contention and identifying any documents that tend to prove or disprove your contention.

RESPONSE TO INTERROGATORY NO. 7:

HFT incorporates each of its General Objections by reference. HFT further objects to this Interrogatory because: (i) it seeks expert opinion and legal conclusions; (ii) it is compound and contains numerous discrete subparts, as it, among other things, seeks information on over a dozen patents and several patent families; (iii) it exceeds the limit on the number of interrogatories under the Federal Rules of Civil Procedure, based on the number of interrogatories Champion has served, which include numerous discrete subparts that count as separate interrogatories; and (iv) it is premature and seeks information that cannot be meaningfully provided at this stage of discovery.

Based on its investigation to date and subject to and without waiving its objections, including the fact Champion has exceeded the 25 interrogatory limit, HFT responds as follows:

A person of ordinary skill in the art (“POSA”) would “be aware of all the pertinent prior art” at the time of the alleged invention (*Custom Accessories, Inc. v. Jeffrey-Allan Indus.*, 807 F.2d 955, 963 (Fed. Cir. 1986)), including specialized knowledge applicable to various aspects of the claimed invention. *See, e.g., AVX Corp. v. Greatbatch, Ltd.*, IPR2014-00697, Paper 60 at 3 (P.T.A.B. Jan. 11, 2016). A POSA is also a person of ordinary creativity, not an automaton, and thus is able to make inferences from the art. *KSR Int’l Co. v. Teleflex*, 550 U.S. 398, 420–21 (2007).

For purposes of this litigation and for each of the patents-in-suit, a POSA would have a college degree in mechanical engineering, physics, materials science, or related fields, and three years of work experience in combustion engines. Additional higher

1 graduate education could substitute for work experience, and additional work
2 experience/training could substitute for formal education.

3 HFT notes that discovery is ongoing, the Court has yet to construe the claim
4 terms, and expert discovery has not yet commenced. Consistent with Fed. R. Civ. P.
5 26(e), HFT reserves the right to supplement or amend this response as it sees fit.

6 **INTERROGATORY NO. 8:**

7 Describe in detail any contention that you do not infringe the Asserted Patents,
8 including but not limited to specifically identifying any claim element you contend is
9 lacking from the Accused Products, and identifying all documents or evidence tending
10 to support or refute your contention.

11 **RESPONSE TO INTERROGATORY NO. 8:**

12 HFT incorporates each of its General Objections by reference. HFT further
13 objects to this Interrogatory because: (i) it is compound and contains numerous
14 discrete subparts, as it, among other things, seeks information on over a dozen patents
15 and several patent families, multiple Accused Products, and the identification of
16 documents; (ii) it exceeds the limit on the number of interrogatories under the Federal
17 Rules of Civil Procedure, based on the number of interrogatories Champion has
18 served, which include numerous discrete subparts that count as separate
19 interrogatories; (iii) it is premature because discovery is ongoing, the Court has yet to
20 conduct claim construction, and the parties are still conferring regarding proposed
21 claim constructions; (iv) it is unduly burdensome as it seeks to impose response
22 requirements well beyond those permitted under the Federal Rules of Civil Procedure;
23 and (v) it seeks expert opinion or legal conclusions.

24 Champion's Infringement Contentions comprised of its responses to HFT's
25 Interrogatory No. 1, as supplemented, are incomplete and deficient on their face and
26 fail to adequately compare each element, limitation, or step of each claim to the aspect
27 of the product that Champion contends satisfies that element or limitation of the claim,
28 as requested by HFT's Interrogatory No. 1. Champion's analysis ignores many claim

1 limitations or merely parrots the claim language and does not indicate whether or how
2 such limitations are met. As a result, HFT lacks notice of Champion’s infringement
3 theories. That HFT has objected to this defect in Champion’s Infringement
4 Contentions in at least some instances is not an indication that Champion’s
5 Infringement Contentions are otherwise sufficient.

6 HFT brought these deficiencies to Champion’s attention for months and again
7 on June 2, 2025. The parties met and conferred regarding these issues, but Champion
8 refused to provide any greater detail or clarification of its infringement theories. *See*
9 June 16, 2025 Email from S. Ahmed to J. Williams. As such, Champion has not met
10 its burden of providing adequate notice of its infringement contentions, and HFT is
11 unable to adequately respond to Champion’s deficient allegations.

12 Subject to and without waiving its objections, including the fact Champion has
13 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
14 willing to meet and confer regarding this Interrogatory.

15 **INTERROGATORY NO. 9:**

16 Identify all Communications, written or oral, between you and any customer,
17 potential customer, distributor, retailer, competitor, or manufacturer which refer to
18 any of the Asserted Patents, Champion, or this litigation, and for each such
19 Communication, identify all persons who participated in and/or are knowledgeable of
20 such Communications; and identify all Documents and things by production number
21 relating to each Communication.

22 **RESPONSE TO INTERROGATORY NO. 9:**

23 HFT incorporates each of its General Objections by reference. HFT further
24 objects to this Interrogatory as vague and ambiguous as to the terms “distributor” or
25 “retailer” as HFT is a retailer and does not rely on distributors, to the terms
26 “competitor” as that term is not defined nor is the market or other information needed
27 to identify companies as “competitors.” HFT also objects to this Interrogatory to the
28 extent that (i) it is compound and contains numerous discrete subparts, as it, among

1 other things, seeks information on over a dozen patents and several patent families,
2 multiple topics, and the identification of persons knowledgeable and of documents;
3 (ii) it exceeds the limit on the number of interrogatories under the Federal Rules of
4 Civil Procedure, based on the number of interrogatories Champion has served, which
5 include numerous discrete subparts that count as separate interrogatories; (iii) it seeks
6 information subject to attorney-client privilege, attorney work product immunity, or
7 other privilege or immunity against disclosure; (iv) it is unduly burdensome as it seeks
8 to impose response requirements well beyond those permitted under the Federal Rules
9 of Civil Procedure; and (v) it seeks information protected from disclosure by HFT's
10 contractual, legal or other obligations to maintain the confidentiality of third party
11 trade secrets and other confidential information. HFT shall only provide the latter
12 such information pursuant to the terms of a Court-ordered Protective Order, and the
13 parties' private agreements relating thereto, to the extent HFT is afforded reasonable
14 notice and a reasonable opportunity to seek consent from the party whose confidential
15 information is sought.

16 Subject to and without waiving its objections, including the fact Champion has
17 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
18 willing to meet and confer regarding this Interrogatory.

19 **INTERROGATORY NO. 10:**

20 Identify three persons, other than lawyers, who are most knowledgeable about
21 each of the following subjects: (a) research and development of the Accused Products;
22 (b) engineering of the Accused Products; (c) sales and distribution of the Accused
23 Products; (d) marketing and advertising of the Accused Products; (e) accounting and
24 finance; (f) information management; and (g) document retention policies.

25 **RESPONSE TO INTERROGATORY NO. 10:**

26 HFT incorporates each of its General Objections by reference. HFT further
27 objects to this Interrogatory to the extent that: (i) it is compound and contains
28 numerous discrete subparts, as it, among other things, seeks information on over a

1 dozen patents and several patent families and multiple Accused Products, and
2 multiple discrete topics; (ii) it exceeds the limit on the number of interrogatories under
3 the Federal Rules of Civil Procedure, based on the number of interrogatories
4 Champion has served, which include numerous discrete subparts that count as
5 separate interrogatories; (iii) it is vague and ambiguous with respect to the term
6 “information management”; (iv) it is unduly burdensome as it seeks to impose
7 response requirements well beyond those permitted under the Federal Rules of Civil
8 Procedure; and (v) it seeks information that is not relevant to any claim or defense at
9 issue in this litigation and/or which is not proportional to the needs of the case.

10 Subject to and without waiving its objections, including the fact Champion has
11 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
12 willing to meet and confer regarding this Interrogatory.

13 **INTERROGATORY NO. 11:**

14 For each claim in Champion’s Preliminary Infringement Contentions, served
15 on April 24, 2025, provide charts, responding to Exhibits A-W of Champion’s
16 Preliminary Infringement Contentions, that separately indicate, for each identified
17 element in each claim, whether You admit to the identity of each element in the
18 Accused Products and, if not, each reason for such denial and the relevant distinctions.

19 **RESPONSE TO INTERROGATORY NO. 11:**

20 HFT incorporates each of its General Objections by reference. HFT further
21 objects to this Interrogatory to the extent it overlaps in scope with Interrogatory No.
22 8, and hereby incorporates its objections and responses to that Interrogatory herein.
23 HFT further objects to this Interrogatory to the extent that: (i) it is compound and
24 contains numerous discrete subparts, as it, among other things, seeks information,
25 including admissions, on multiple charts, over a hundred asserted claims, hundreds of
26 claim limitations, over a dozen patents and several patent families and multiple
27 Accused Products; (ii) it exceeds the limit on the number of interrogatories under the
28 Federal Rules of Civil Procedure, based on the number of interrogatories Champion

1 has served, which include numerous discrete subparts that count as separate
2 interrogatories; (iii) it seeks an unduly burdensome number of requests for admission
3 and interrogatories because there are 119 asserted claims, each having numerous
4 claim limitations (thus, asking HFT to admit or deny each limitation and explain each
5 denial is unduly burdensome); (iv) it is premature because discovery is ongoing, the
6 Court has yet to conduct claim construction, and the parties are still conferring
7 regarding proposed claim constructions; (v) it is unduly burdensome as it seeks to
8 impose response requirements well beyond those permitted under the Federal Rules
9 of Civil Procedure; and (vi) it seeks expert opinion or legal conclusions.

10 Subject to and without waiving its objections, including the fact Champion has
11 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
12 willing to meet and confer regarding this Interrogatory.

13 **INTERROGATORY NO. 12:**

14 For each of the Asserted Patents, provide charts that describe in detail the
15 complete factual and legal bases supporting any contention that the Asserted Patents
16 are invalid and unenforceable under 35 U.S.C. §§ 101, 102, 103, and 112.

17 **RESPONSE TO INTERROGATORY NO. 12:**

18 HFT incorporates each of its General Objections by reference. HFT further
19 objects to this Interrogatory to the extent that: (i) it is compound and contains
20 numerous discrete subparts, as it, among other things, seeks information on multiple
21 invalidity grounds, over a dozen patents and several patent families and multiple
22 Accused Products; (ii) it exceeds the limit on the number of interrogatories under the
23 Federal Rules of Civil Procedure, based on the number of interrogatories Champion
24 has served, which include numerous discrete subparts that count as separate
25 interrogatories; (iii) it is premature because discovery is ongoing and the Interrogatory
26 seeks contentions concerning claim construction prior to the deadlines in the
27 procedural schedule in this case; (iv) it is unduly burdensome as it seeks to impose
28 response requirements well beyond those permitted under the Federal Rules of Civil

1 Procedure; and (v) it seeks information subject to attorney-client privilege, attorney
2 work product immunity, or other privilege or immunity against disclosure.

3 Subject to and without waiving its objections, including the fact Champion has
4 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
5 willing to meet and confer regarding this Interrogatory.

6 **INTERROGATORY NO. 13:**

7 Describe in detail all instances in which you or any of your affiliates instructed,
8 directed, or implemented changes to the Accused Products, including detailing what
9 changes were made and when from January 2018 till present.

10 **RESPONSE TO INTERROGATORY NO. 13:**

11 HFT incorporates each of its General Objections by reference. HFT further
12 objects to this Interrogatory to the extent that (i) it is compound and contains
13 numerous discrete subparts, as it, among other things, seeks information on multiple
14 Accused Products; (ii) it exceeds the limit on the number of interrogatories under the
15 Federal Rules of Civil Procedure, based on the number of interrogatories Champion
16 has served, which include numerous discrete subparts that count as separate
17 interrogatories; (iii) it is vague and ambiguous; (iv) it is unduly burdensome as it seeks
18 to impose response requirements well beyond those permitted under the Federal Rules
19 of Civil Procedure; (v) it is overbroad and unduly burdensome to the extent it asks
20 HFT to “[d]escribe in detail all instances.” HFT also objects to this interrogatory as
21 premature to the extent the Court has yet to enter a protective order in this case and
22 the parties have yet to agree on a stipulation as to electronically stored information
23 (“ESI”).

24 Subject to and without waiving its objections, including the fact Champion has
25 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
26 willing to meet and confer regarding this Interrogatory.

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1 **INTERROGATORY NO. 14:**

2 Explain in detail the factual basis, including identifying all documents and any
3 and all supporting testimony or witnesses, that support or contradict your assertion
4 that “Champion’s claims of patent infringement are barred, in whole or in part, by the
5 doctrine of prosecution history estoppel”.

6 **RESPONSE TO INTERROGATORY NO. 14:**

7 HFT incorporates each of its General Objections by reference. HFT further
8 objects to this Interrogatory to the extent that (i) it is compound and contains
9 numerous discrete subparts, as it, among other things, seeks information on over a
10 dozen patents and several patent families; (ii) it exceeds the limit on the number of
11 interrogatories under the Federal Rules of Civil Procedure, based on the number of
12 interrogatories Champion has served, which include numerous discrete subparts that
13 count as separate interrogatories; (iii) it is premature because discovery is ongoing
14 and the parties have not yet briefed claim construction and are currently conferring
15 regarding disputed claim terms; (iv) Champion has yet to address deficiencies in its
16 infringement contentions as served to date in response to interrogatories; and (iv) it is
17 unduly burdensome as it seeks to impose response requirements well beyond those
18 permitted under the Federal Rules of Civil Procedure.

19 Subject to and without waiving its objections, including the fact Champion has
20 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
21 willing to meet and confer regarding this Interrogatory.

22 **INTERROGATORY NO. 15:**

23 Explain in detail the factual basis, including identifying all documents and any
24 and all supporting testimony or witnesses, that support or contradict your assertion
25 that “[t]he RD9000E dual fuel generator was publicly available and sold by Firman
26 Power Equipment Inc. (“Firman”) prior to June 12, 2015” (emphasis added).

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1 **RESPONSE TO INTERROGATORY NO. 15:**

2 HFT incorporates each of its General Objections by reference. HFT further
3 objects to this Interrogatory to the extent that: (i) it is compound and contains
4 numerous discrete subparts, as it, among other things, seeks an explanation, identity
5 of documents and of testimony; (ii) it exceeds the limit on the number of
6 interrogatories under the Federal Rules of Civil Procedure, based on the number of
7 interrogatories Champion has served, which include numerous discrete subparts that
8 count as separate interrogatories; (iii) it is vague and ambiguous; (iv) it is overbroad
9 and unduly burdensome and duplicative of other discovery including other
10 Interrogatories; (v) it seeks information that is not relevant to any claim or defense at
11 issue in this litigation and/or which is not proportional to the needs of the case; (vi) it
12 seeks information in a format or at a level of detail other than that which is ordinarily
13 kept and maintained by HFT in its regular course of business; (vii) it seeks
14 information subject to attorney-client privilege, attorney work product immunity, or
15 other privilege or immunity against disclosure; (viii) it seeks information uniquely
16 within the possession of defendant or which is equally available to both parties, such
17 as public information or information maintained by third parties; (ix) it seeks evidence
18 outside of HFT's possession, custody, or control; or which is not practically
19 ascertainable based on a reasonable, good faith investigation; (x) it seeks information
20 protected from disclosure by HFT's contractual, legal or other obligations to maintain
21 the confidentiality of third party trade secrets and other confidential information, and
22 as such, HFT shall only provide such information pursuant to the terms of a Court-
23 ordered Protective Order, and the parties' private agreements relating thereto, to the
24 extent HFT is afforded reasonable notice and a reasonable opportunity to seek consent
25 from the party whose confidential information is sought; (xi) it is unduly burdensome
26 as it seeks to impose response requirements well beyond those permitted under the
27 Federal Rules of Civil Procedure; and (xii) it seeks expert opinion or legal
28 conclusions.

1 Subject to and without waiving its objections, including the fact Champion has
2 exceeded the 25 interrogatory limit, HFT will not further respond, although it is
3 willing to meet and confer regarding this Interrogatory.

4
5
6 DATED: July 18, 2025

Respectfully submitted,

7 **QUINN EMANUEL URQUHART &**
8 **SULLIVAN, LLP**

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10
11 By /s/ Eric Huang

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27 *Attorneys for Plaintiff Harbor Freight*
28 *Tools USA, Inc.*

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CERTIFICATE OF SERVICE

I, Jason Williams, hereby certify that on July 18, 2025, a copy of the foregoing **HFT’s Objections and Responses to Champion’s Second Set of Interrogatories** was served via email on all attorneys of record.

/s/ Jason C. Williams _____
Jason C. Williams
*Attorneys for Plaintiff Harbor Freight
Tools USA, Inc.*