

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROBERT BOSCH LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 12-574-LPS
	)	(consolidated)
ALBEREE PRODUCTS, INC.,	)	
API KOREA CO., LTD.,	)	JURY TRIAL DEMANDED
SAVER AUTOMOTIVE PRODUCTS, INC.,	)	
and COSTCO WHOLESALE CORPORATION,	)	
	)	
Defendants.	)	

NOTICE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the attached document was caused to be served on November 7, 2014, upon the following attorneys of record as indicated below:

AMENDED 30(b)(6) JURISDICTIONAL NOTICE OF
DEPOSITION OF API

VIA ELECTRONIC MAIL

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1171663 / 39026

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**IN THE UNITED STATES DISTRICT COURT
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ROBERT BOSCH LLC,

Plaintiff,

v.

ALBEREE PRODUCTS, INC.,
API KOREA CO., LTD.,
SAVER AUTOMOTIVE PRODUCTS, INC.,
AND COSTCO WHOLESALE
CORPORATION

Defendants.

C.A. No. 12-574-LPS, 14-142-LPS

AMENDED 30(b)(6) JURISDICTIONAL NOTICE OF DEPOSITION OF API

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Robert Bosch LLC (“Bosch”), by and through its attorneys, will take the deposition upon oral examination of Defendant API Korea Co. Ltd. (“API”) commencing on November 10, 2014 at 10:00 am at the offices of Birch, Stewart, Kolasch & Birch, LLP, 8110 Gatehouse Road Suite 100 East, Falls Church, Virginia 22042, or at such other time and place as may be agreed upon by counsel, and will continue from day to day, until completed, with such adjournments as to time and place as may be necessary. The testimony will be taken before a court reporter, notary public, or other person authorized by law to administer oaths and will be recorded by stenographic, audio and visual means.

Pursuant to Rule 30(b)(6), API shall designate one or more of its officers, directors, or managing agents, or designate other persons who consent to testify on its behalf as to all matters known or reasonably available to API with respect to each of the Topics of Examination set forth in Schedule A. Bosch requests that API identify each person so designated and the matters on which each such person designated will testify in advance of the deposition.

Dated: November 7, 2014

By: /s/ Ksenia Takhistova

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SCHEDULE A

DEFINITIONS

Bosch LLC incorporates by reference the definitions set forth in *Plaintiff Robert Bosch LLC's First Set of Jurisdictional Interrogatories to Defendants API Korea Co., Ltd. (Nos. 1–2)* and *Plaintiff Robert Bosch LLC's First Set of Jurisdictional Requests to API Korea Co. Ltd. for Production of Documents and Things (Nos. 1–13)*.

TOPICS OF EXAMINATION

1. The relationship, legal, financial or otherwise, past and present, between API and/or Choon Bae Lee on the one hand, and Alberee, Saver and/or Albert Lee on the other, including but not limited to any ownership interests and Affiliates shared between or among API and/or Choon Bae Lee on the one hand, and Alberee, Saver and/or Albert Lee on the other, and any parent company-subsidiary, licensee-licensor, assignee-assignor, or other relationship, including but not limited to any relationship involving the development, design, testing, manufacture, distribution, sale and/or offer for sale of any component of any of the Accused Products.
2. The relationship between API and/or Choon Bae Lee on the one hand, and Alberee, Saver and/or Albert Lee on the other as the relationship relates to the filing of any patent applications, including but not limited to any Korean patent applications filed by or on behalf of API that name Albert Lee as an inventor.
3. Patent applications filed by or on behalf of API that name Albert Lee as an inventor.
4. The financial relationship between API on the one hand, and Alberee and/or Saver on the other, including but not limited to any payments made or other financial transactions between the companies.
5. The corporate structure and governance of API, including the identity of each legal entity within API, or related directly or indirectly to API.
6. The solvency and capitalization of API, including capital contributions made in the past 3 years.
7. Purchase agreements between API and Alberee, and API and Saver, including without limitation payments made under any such agreements.
8. API's customers for any components of the Accused Products, and purchase agreements between API and each such customer.
9. API's knowledge of Bosch's claims of infringement of one or more of Bosch's Asserted Patents, including but not limited to API's awareness of Bosch's claims of contributory and

induced infringement of its patents by API.

10. API's supplying of components of the Accused Products, including without limitation API's knowledge that such Accused Products are being distributed, sold, or offered for sale in the State of Delaware.
11. Steps taken by API since the filing of the ITC Action to prevent the Accused Products for which API supplies components from being distributed, sold, or being offered for sale in the State of Delaware, or to prevent infringement, contributory infringement, or inducement of the infringement of any of the asserted claims of the Asserted Patents.
12. API's contention that this Court does not have personal jurisdiction over API.
13. API's contention that the United States District Court for the District of Maryland has personal jurisdiction over API.

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2014 a true and correct copy of the foregoing document was served on defendants by causing it to be delivered to the counsel of record in the following manner:

By Email:

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