

EXHIBIT 11

Part 1 of 2

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 15 *Pacific Award Metals, Inc.*

16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA**
 18 **SAN FRANCISCO DIVISION**

20 UNITED STATES GYPSUM COMPANY, Case No. C 04-04941 JSW

21 Plaintiff,

22 v.

23 PACIFIC AWARD METALS, INC.,

24 Defendant

**DEFENDANT'S RESPONSE TO
 PLAINTIFF'S FIRST SET OF
 REQUESTS FOR ADMISSIONS (1-263)**

1 Defendant and Counterclaimant Pacific Award Metals, Inc. ("Award Metals")
2 provides the following responses to First Set of Requests for Admissions (1-263)
3 ("Requests for Admissions") of Plaintiff and Counterclaim Defendant United States
4 Gypsum Company ("USG").

5 GENERAL OBJECTIONS

6 1. Award Metals objects to the Requests for Admissions to the extent that they
7 seek to impose a duty on Award Metals beyond that which is required by the Federal
8 Rules of Civil Procedure, the Civil Local Rules of the United States District Court for the
9 Northern District of California, and/or the Patent Local Rules of the United States District
10 Court for the Northern District of California.

11 2. Award Metals objects to the Requests for Admissions to the extent that they
12 call for information protected by the attorney-client privilege, the work product doctrine,
13 and/or any other applicable privilege. Such information will not be provided in response
14 to the Requests for Admissions.

15 3. Award Metals objects to the Requests for Admissions to the extent that they
16 purport to require Award Metals to provide information that is not relevant to the claims
17 or defenses of any party asserted in the litigation or not reasonably calculated to lead to
18 the discovery of admissible evidence under Federal Rule of Civil Procedure 26.

19 4. Award Metals objects to the Requests for Admissions to the extent that they
20 seek information that is subject to confidentiality agreements, protective orders, or any
21 other obligation pursuant to which Award Metals is required to protect and/or maintain
22 the confidentiality of any third party's documents or information. Notwithstanding this
23 objection, Award Metals will initiate any necessary process of notification to such third
24 parties that may be a predicate to disclosure of any such confidential information.

25 5. Award Metals objects to the Requests for Admissions as premature to the
26 extent that they seek information or documents regarding information, contentions, or
27 defenses which the parties have agreed to provide later in the case and/or which are to be
28 provided according to the schedule set by the Local Rules, the Patent Local Rules, and/or

1 the Case Management Order in this case. In addition, discovery in this matter and Award
2 Metal's investigation of the subject matter of this litigation, including expert investigation
3 and third party discovery, is ongoing.

4 6. Award Metals objects to the Requests for Admissions and each and every
5 Request therein as duplicative, unduly harassing and burdensome.

6 7. Nothing in Award Metal's responses to the Requests for Admissions
7 constitutes an admission concerning the scope of the claims of any patent in issue nor of
8 the relation of any such claims to any product made, used, sold, offered for sale, or
9 imported by Award Metals.

10 8. No incidental or implied admission is intended by the responses below.
11 The fact that Award Metals has answered part of any Request is not intended to be, and
12 shall not be construed to be, an admission as to any part of the Request which Award
13 Metals has not expressly answered, or of any objection to the Request.

14 9. Award Metals will make, and has made, reasonable efforts to respond to the
15 Requests for Admissions, to the extent that no objection is made, as Award Metals
16 understands and interprets each Request. If USG subsequently asserts any interpretation
17 of any Request that differs from the interpretation of Award Metals, then Award Metals
18 reserves the right to supplement and amend its objections and responses.

19 10. Award Metals expressly reserves the right to supplement and/or amend its
20 responses to the Requests for Admissions at a later date.

21 OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

22 1. Award Metals objects to the Definitions and Instructions in the Requests for
23 Admissions to the extent that they seek to impose a duty on Award Metals beyond that
24 which is required by the Federal Rules of Civil Procedure, the Civil Local Rules of the
25 United States District Court for the Northern District of California, and/or the Patent
26 Local Rules of the United States District Court for the Northern District of California.

27 2. Award Metals objects to the definition of the term "documents" to the
28 extent that USG seeks to impose a duty on Award Metals beyond that which is required

1 by the Federal Rules of Civil Procedure and/or the Civil Local Rules of the United States
2 District Court for the Northern District of California.

3 **REQUESTS FOR ADMISSIONS**

4 **Request For Admission No. 1:**

5 Admit that the Accused Products are corner bead products for drywall
6 construction.

7 **Response To Request For Admission No. 1:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is vague and ambiguous, particularly with respect to the term "corner bead
11 products." In addition, Award Metals objects to this Request on the grounds that it is
12 overbroad and compound. Subject to and without waiving the foregoing objections,
13 Award Metals responds as follows: Admit.

14 **Request For Admission No. 2:**

15 Admit that the Accused Products have a core strip.

16 **Response To Request For Admission No. 2:**

17 Award Metals incorporates by reference its General Objections and Objections to
18 Definitions and Instructions. Award Metals further objects to this Request on the grounds
19 that it is overbroad and compound. Subject to and without waiving the foregoing
20 objections, Award Metals responds as follows: Admit.

21 **Request For Admission No. 3:**

22 Admit that the Accused Products have a core strip that has a central portion where
23 two side flanges come together.

24 **Response To Request For Admission No. 3:**

25 Award Metals incorporates by reference its General Objections and Objections to
26 Definitions and Instructions. Award Metals further objects to this Request on the grounds
27 that it is vague and ambiguous. In addition, Award Metals objects to this Request on the
28 grounds that it is overbroad and compound. Subject to and without waiving the foregoing

1 objections, Award Metals responds as follows: Admit.

2 **Request For Admission No. 4:**

3 Admit that the Accused Products have two side flanges extending laterally at about
4 a right angle relative to one another.

5 **Response To Request For Admission No. 4:**

6 Award Metals incorporates by reference its General Objections and Objections to
7 Definitions and Instructions. Award Metals further objects to this Request on the grounds
8 that it is overbroad and compound. Subject to and without waiving the foregoing
9 objections, Award Metals responds as follows: Admit.

10 **Request For Admission No. 5:**

11 Admit that the Accused Products have respective shoulder portions joining said
12 central portion and said side flanges.

13 **Response To Request For Admission No. 5:**

14 Award Metals incorporates by reference its General Objections and Objections to
15 Definitions and Instructions. Award Metals further objects to this Request on the grounds
16 that it is overbroad and compound. Subject to and without waiving the foregoing
17 objections, Award Metals responds as follows: Admit.

18 **Request For Admission No. 6:**

19 Admit that the Accused Products have a core strip having a central portion, two
20 side flanges extending laterally at about a right angle relative to one another, respective
21 shoulder portions joining said central portion and said side flanges.

22 **Response To Request For Admission No. 6:**

23 Award Metals incorporates by reference its General Objections and Objections to
24 Definitions and Instructions. Award Metals further objects to this Request on the grounds
25 that it is overbroad and compound. Subject to and without waiving the foregoing
26 objections, Award Metals responds as follows: Admit.

27 **Request For Admission No. 7:**

28 Admit that the Accused Products have a front paper layer.

Response To Request For Admission No. 7:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is overbroad and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Admit.

Request For Admission No. 8:

Admit that the Accused Products have a front paper layer covering the outer face of said core strip and bonded thereto.

Response To Request For Admission No. 8:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is overbroad and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Admit.

Request For Admission No. 9:

Admit that the Accused Products have a thin protective coating.

Response To Request For Admission No. 9:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is vague and ambiguous, particularly with respect to the term "thin protective coating." In addition, Award Metals objects to this Request on the grounds that it is overbroad and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Deny.

Request For Admission No. 10:

Admit that the Accused Products have a thin protective coating on said front paper layer at said shoulder portions and an adjoining portion of said central portion along the length of said core strip.

Response To Request For Admission No. 10:

Award Metals incorporates by reference its General Objections and Objections to

1 Definitions and Instructions. Award Metals further objects to this Request on the grounds
2 that it is vague and ambiguous, particularly with respect to the term "thin protective
3 coating." In addition, Award Metals objects to this Request on the grounds that it is
4 overbroad and compound. Subject to and without waiving the foregoing objections,
5 Award Metals responds as follows: Deny.

6 **Request For Admission No. 11:**

7 Admit that the protective coating used in the Accused Products penetrates some of
8 the fibers of the front paper layer.

9 **Response To Request For Admission No. 11:**

10 Award Metals incorporates by reference its General Objections and Objections to
11 Definitions and Instructions. Award Metals further objects to this Request on the grounds
12 that it is overbroad and compound. Subject to and without waiving the foregoing
13 objections, Award Metals responds as follows: Deny.

14 **Request For Admission No. 12:**

15 Admit that the Accused Products have some thickness of protective coating that
16 remains above the paper fibers of the front paper layer.

17 **Response To Request For Admission No. 12:**

18 Award Metals incorporates by reference its General Objections and Objections to
19 Definitions and Instructions. Award Metals further objects to this Request on the grounds
20 that it is overbroad and compound. Subject to and without waiving the foregoing
21 objections, Award Metals responds as follows: Deny.

22 **Request For Admission No. 13:**

23 Admit that the Accused Products have shoulder portions, a front paper layer, and
24 protective coating, which collectively provide outermost exposed shoulders so that the
25 joint cement or the like can be applied over the paper-covered flanges and dressed to the
26 outermost exposed shoulders, after the corner bead is applied to a drywall corner.

27 **Response To Request For Admission No. 13:**

28 Award Metals incorporates by reference its General Objections and Objections to

1 Definitions and Instructions. Award Metals further objects to this Request on the grounds
2 that it is overbroad and compound. Subject to and without waiving the foregoing
3 objections, Award Metals responds as follows: Deny.

4 **Request For Admission No. 14:**

5 Admit that the protective coating used in the Accused Product is substantially
6 more resistant to abrasive action than joint cement.

7 **Response To Request For Admission No. 14:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is overbroad and compound. Subject to and without waiving the foregoing
11 objections, Award Metals responds as follows: Deny.

12 **Request For Admission No. 15:**

13 Admit that the protective coating used in the Accused Products that remains above
14 the paper fibers of the front paper layer is effective in resisting abrasion.

15 **Response To Request For Admission No. 15:**

16 Award Metals incorporates by reference its General Objections and Objections to
17 Definitions and Instructions. Award Metals further objects to this Request on the grounds
18 that it is overbroad and compound. Subject to and without waiving the foregoing
19 objections, Award Metals responds as follows: Deny.

20 **Request For Admission No. 16:**

21 Admit that Award Metals' Nail-On Corner Bead has a corner bead in which the
22 front paper layer has doubled back portions behind the core strip and cover the outer
23 edges of the side flanges.

24 **Response To Request For Admission No. 16:**

25 Award Metals incorporates by reference its General Objections and Objections to
26 Definitions and Instructions. Award Metals further objects to this Request on the grounds
27 that it is vague and ambiguous, particularly with respect to the term "Nail-On Corner
28 Bead." In addition, Award Metals objects to this Request on the grounds that it is

1 overbroad and compound. Subject to and without waiving the foregoing objections,
2 Award Metals responds as follows: Admit only to the extent that "Nail-On Corner Bead"
3 means the Accused Products listed under the heading "Nail-On Corner Bead" in Exhibit
4 A-1 to Plaintiff's Final Infringement Contentions.

5 **Request For Admission No. 17:**

6 Admit that Award Metals' ABN N product has a corner bead in which the front
7 paper layer has doubled back portions behind the core strip and cover the outer edges of
8 the side flanges.

9 **Response To Request For Admission No. 17:**

10 Award Metals incorporates by reference its General Objections and Objections to
11 Definitions and Instructions. Award Metals further objects to this Request on the grounds
12 that it is overbroad and compound. Subject to and without waiving the foregoing
13 objections, Award Metals responds as follows: Admit.

14 **Request For Admission No. 18:**

15 Admit that Award Metals' ABN NXW product has a corner bead in which the
16 front paper layer has doubled back portions behind the core strip and cover the outer
17 edges of the side flanges.

18 **Response To Request For Admission No. 18:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is overbroad and compound. Subject to and without waiving the foregoing
22 objections, Award Metals responds as follows: Admit.

23 **Request For Admission No. 19:**

24 Admit that Award Metals' SBN N product has a corner bead in which the front
25 paper layer has doubled back portions behind the core strip and cover the outer edges of
26 the side flanges.

27 **Response To Request For Admission No. 19:**

28 Award Metals incorporates by reference its General Objections and Objections to

1 Definitions and Instructions. Award Metals further objects to this Request on the grounds
2 that it is overbroad and compound. Subject to and without waiving the foregoing
3 objections, Award Metals responds as follows: Admit.

4 **Request For Admission No. 20:**

5 Admit that Award Metals' SBN NXW product has a corner bead in which the front
6 paper layer has doubled back portions behind the core strip and cover the outer edges of
7 the side flanges.

8 **Response To Request For Admission No. 20:**

9 Award Metals incorporates by reference its General Objections and Objections to
10 Definitions and Instructions. Award Metals further objects to this Request on the grounds
11 that it is overbroad and compound. Subject to and without waiving the foregoing
12 objections, Award Metals responds as follows: Admit.

13 **Request For Admission No. 21:**

14 Admit that Award Metals' SBN N1/2 R(SMBN) product has a corner bead in
15 which the front paper layer has doubled back portions behind the core strip and cover the
16 outer edges of the side flanges.

17 **Response To Request For Admission No. 21:**

18 Award Metals incorporates by reference its General Objections and Objections to
19 Definitions and Instructions. Award Metals further objects to this Request on the grounds
20 that it is overbroad and compound. Subject to and without waiving the foregoing
21 objections, Award Metals responds as follows: Admit.

22 **Request For Admission No. 22:**

23 Admit that Award Metals' SIXXWN product has a corner bead in which the front
24 paper layer has doubled back portions behind the core strip and cover the outer edges of
25 the side flanges.

26 **Response To Request For Admission No. 22:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is overbroad and compound. Subject to and without waiving the foregoing
2 objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 23:**

4 Admit that the central portion of the core strip of Award Metals' "Bullnose
5 Outside Corner Bead" products have a rounded nose, commonly known as a "bullnose"
6 between the shoulder portions.

7 **Response To Request For Admission No. 23:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is vague and ambiguous, particularly with respect to the term ""Bullnose Outside
11 Corner Bead" products." In addition, Award Metals objects to this Request on the
12 grounds that it is overbroad and compound. Subject to and without waiving the foregoing
13 objections, Award Metals responds as follows: Admit only to the extent that ""Bullnose
14 Outside Corner Bead" products" means the Accused Products listed under the heading
15 "Bullnose Outside Corner Bead" in Exhibit A-1 to Plaintiff's Final Infringement
16 Contentions.

17 **Request For Admission No. 24:**

18 Admit that the central portion of the core strip of Award Metals' ABN product has
19 a rounded nose, commonly known as a "bullnose" between the shoulder portions.

20 **Response To Request For Admission No. 24:**

21 Award Metals incorporates by reference its General Objections and Objections to
22 Definitions and Instructions. Award Metals further objects to this Request on the grounds
23 that it is overbroad and compound. Subject to and without waiving the foregoing
24 objections, Award Metals responds as follows: Admit.

25 **Request For Admission No. 25:**

26 Admit that the central portion of the core strip of Award Metals' ABN N product
27 has a rounded nose, commonly known as a "bullnose" between the shoulder portions.
28

1 **Response To Request For Admission No. 25:**

2 Award Metals incorporates by reference its General Objections and Objections to
3 Definitions and Instructions. Award Metals further objects to this Request on the grounds
4 that it is overbroad and compound. Subject to and without waiving the foregoing
5 objections, Award Metals responds as follows: Admit.

6 **Request For Admission No. 26:**

7 Admit that the central portion of the core strip of Award Metals' ABN NXW
8 product has a rounded nose, commonly known as a "bullnose" between the shoulder
9 portions.

10 **Response To Request For Admission No. 26:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is overbroad and compound. Subject to and without waiving the foregoing
14 objections, Award Metals responds as follows: Admit.

15 **Request For Admission No. 27:**

16 Admit that the central portion of the core strip of Award Metals' SBN product has
17 a rounded nose, commonly known as a "bullnose" between the shoulder portions.

18 **Response To Request For Admission No. 27:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is overbroad and compound. Subject to and without waiving the foregoing
22 objections, Award Metals responds as follows: Admit.

23 **Request For Admission No. 28:**

24 Admit that the central portion of the core strip of Award Metals' SBN N product
25 has a rounded nose, commonly known as a "bullnose" between the shoulder portions.

26 **Response To Request For Admission No. 28:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is overbroad and compound. Subject to and without waiving the foregoing
2 objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 29:**

4 Admit that the central portion of the core strip of Award Metals' SBN NXW
5 product has a rounded nose, commonly known as a "bullnose" between the shoulder
6 portions.

7 **Response To Request For Admission No. 29:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is overbroad and compound. Subject to and without waiving the foregoing
11 objections, Award Metals responds as follows: Admit.

12 **Request For Admission No. 30:**

13 Admit that the central portion of the core strip of Award Metals' SBN
14 1/2R(SMB1/2R) product has a rounded nose, commonly known as a "bullnose" between
15 the shoulder portions.

16 **Response To Request For Admission No. 30:**

17 Award Metals incorporates by reference its General Objections and Objections to
18 Definitions and Instructions. Award Metals further objects to this Request on the grounds
19 that it is overbroad and compound. Subject to and without waiving the foregoing
20 objections, Award Metals responds as follows: Admit.

21 **Request For Admission No. 31:**

22 Admit that the central portion of the core strip of Award Metals' SBN N 1/2
23 (SMBN) product has a rounded nose, commonly known as a "bullnose" between the
24 shoulder portions.

25 **Response To Request For Admission No. 31:**

26 Award Metals incorporates by reference its General Objections and Objections to
27 Definitions and Instructions. Award Metals further objects to this Request on the grounds
28 that it is overbroad and compound. Subject to and without waiving the foregoing

1 objections, Award Metals responds as follows: Admit.

2 **Request For Admission No. 32:**

3 Admit that Award Metals' "Even Leg Outside Corner Bead" products have a rib or
4 bead in the longitudinal center of the core strip.

5 **Response To Request For Admission No. 32:**

6 Award Metals incorporates by reference its General Objections and Objections to
7 Definitions and Instructions. Award Metals further objects to this Request on the grounds
8 that it is vague and ambiguous, particularly with respect to the term "'Even Leg Outside
9 Corner Bead" products.'" In addition, Award Metals objects to this Request on the
10 grounds that it is overbroad and compound. Subject to and without waiving the foregoing
11 objections, Award Metals responds as follows: Admit only to the extent that "'Even Leg
12 Outside Corner Bead" products" means the Accused Products listed under the heading
13 "Even Leg Outside Corner Bead" in Exhibit A-1 to Plaintiff's Final Infringement
14 Contentions.

15 **Request For Admission No. 33:**

16 Admit that Award Metals' Al W EL product has a rib or bead in the longitudinal
17 center of the core strip.

18 **Response To Request For Admission No. 33:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is overbroad and compound. Subject to and without waiving the foregoing
22 objections, Award Metals responds as follows: Admit.

23 **Request For Admission No. 34:**

24 Admit that Award Metals' Al XW EL product has a rib or bead in the longitudinal
25 center of the core strip.

26 **Response To Request For Admission No. 34:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is overbroad and compound. Subject to and without waiving the foregoing
2 objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 35:**

4 Admit that Award Metals' AI W EL NB product has a rib or bead in the
5 longitudinal center of the core strip.

6 **Response To Request For Admission No. 35:**

7 Award Metals incorporates by reference its General Objections and Objections to
8 Definitions and Instructions. Award Metals further objects to this Request on the grounds
9 that it is overbroad and compound. Subject to and without waiving the foregoing
10 objections, Award Metals responds as follows: Admit.

11 **Request For Admission No. 36:**

12 Admit that Award Metals' A1MB product has a rib or bead in the longitudinal
13 center of the core strip.

14 **Response To Request For Admission No. 36:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is overbroad and compound. Subject to and without waiving the foregoing
18 objections, Award Metals responds as follows: Admit.

19 **Request For Admission No. 37:**

20 Admit that Award Metals' S1XW product has a rib or bead in the longitudinal
21 center of the core strip.

22 **Response To Request For Admission No. 37:**

23 Award Metals incorporates by reference its General Objections and Objections to
24 Definitions and Instructions. Award Metals further objects to this Request on the grounds
25 that it is overbroad and compound. Subject to and without waiving the foregoing
26 objections, Award Metals responds as follows: Admit.

27 **Request For Admission No. 38:**

28 Admit that Award Metals' S1XXW product has a rib or bead in the longitudinal

1 center of the core strip.

2 **Response To Request For Admission No. 38:**

3 Award Metals incorporates by reference its General Objections and Objections to
4 Definitions and Instructions. Award Metals further objects to this Request on the grounds
5 that it is overbroad and compound. Subject to and without waiving the foregoing
6 objections, Award Metals responds as follows: Admit.

7 **Request For Admission No. 39:**

8 Admit that Award Metals' S1XXWN product has a rib or bead in the longitudinal
9 center of the core strip.

10 **Response To Request For Admission No. 39:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is overbroad and compound. Subject to and without waiving the foregoing
14 objections, Award Metals responds as follows: Admit.

15 **Request For Admission No. 40:**

16 Admit that Award Metals' A4 1 product has a rib or bead in the longitudinal center
17 of the core strip.

18 **Response To Request For Admission No. 40:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is overbroad and compound. Subject to and without waiving the foregoing
22 objections, Award Metals responds as follows: Admit.

23 **Request For Admission No. 41:**

24 Admit that Award Metals' A4 1-1/8 product has a rib or bead in the longitudinal
25 center of the core strip.

26 **Response To Request For Admission No. 41:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is overbroad and compound. Subject to and without waiving the foregoing
2 objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 42:**

4 Admit that Award Metals' A4 1 NB product has a rib or bead in the longitudinal
5 center of the core strip.

6 **Response To Request For Admission No. 42:**

7 Award Metals incorporates by reference its General Objections and Objections to
8 Definitions and Instructions. Award Metals further objects to this Request on the grounds
9 that it is overbroad and compound. Subject to and without waiving the foregoing
10 objections, Award Metals responds as follows: Deny.

11 **Request For Admission No. 43:**

12 Admit that Award Metals' A4 1-1/8 NB product has a rib or bead in the
13 longitudinal center of the core strip.

14 **Response To Request For Admission No. 43:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is overbroad and compound. Subject to and without waiving the foregoing
18 objections, Award Metals responds as follows: Deny.

19 **Request For Admission No. 44:**

20 Admit that Award Metals' A4 1-1/4 NB product has a rib or bead in the
21 longitudinal center of the core strip.

22 **Response To Request For Admission No. 44:**

23 Award Metals incorporates by reference its General Objections and Objections to
24 Definitions and Instructions. Award Metals further objects to this Request on the grounds
25 that it is overbroad and compound. Subject to and without waiving the foregoing
26 objections, Award Metals responds as follows: Deny.

27 **Request For Admission No. 45:**

28 Admit that the protective coating used in the Accused Products contains an acrylic

1 resin.

2 **Response To Request For Admission No. 45:**

3 Award Metals incorporates by reference its General Objections and Objections to
4 Definitions and Instructions. Award Metals further objects to this Request on the grounds
5 that it is overbroad, unduly burdensome and compound. Subject to and without waiving
6 the foregoing objections, Award Metals responds as follows: Award Metals lacks
7 sufficient information or knowledge to admit or deny this Request; and on that basis
8 denies the Request.

9 **Request For Admission No. 46:**

10 Admit that Award Metals had or has in its possession Beadex/USG engineering
11 drawings for its paper faced corner bead line.

12 **Response To Request For Admission No. 46:**

13 Award Metals incorporates by reference its General Objections and Objections to
14 Definitions and Instructions. Award Metals further objects to this Request on the grounds
15 that it is vague and ambiguous, particularly with respect to the terms "possession" and
16 "paper faced corner bead line." In addition, Award Metals objects to this Request on the
17 grounds that it is overbroad. Award Metals further objects to this Request on the grounds
18 that it calls for a legal conclusion. Subject to and without waiving the foregoing
19 objections, Award Metals responds as follows: Deny.

20 **Request For Admission No. 47:**

21 Admit that the engineering drawings provided to Award Metals by Breedt
22 Production Tooling and Design was used by Award Metals.

23 **Response To Request For Admission No. 47:**

24 Award Metals incorporates by reference its General Objections and Objections to
25 Definitions and Instructions. Award Metals further objects to this Request on the grounds
26 that it is vague and ambiguous, particularly with respect to the term "the engineering
27 drawings" as Breedt Tooling and Design has provided a significant number of drawings
28 or other documents to Award. In addition, Award Metals objects to this Request on the

1 grounds that it is overbroad and compound. Subject to and without waiving the foregoing
2 objections, Award Metals responds as follows: Award admits that a set of Breedt
3 Production Tooling and Design engineering drawings relating to Award's machinery used
4 in the manufacture of paper faced corner bead product is kept by Award for reference
5 purposes.

6 **Request For Admission No. 48:**

7 Admit that the engineering drawing at PAC 005063 was created by copying,
8 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

9 **Response To Request For Admission No. 48:**

10 Award Metals incorporates by reference its General Objections and Objections to
11 Definitions and Instructions. Award Metals further objects to this Request on the grounds
12 that it is vague and ambiguous, overbroad, and compound. Subject to and without
13 waiving the foregoing objections, Award Metals responds as follows: Admit.

14 **Request For Admission No. 49:**

15 Admit that figures and dimensions described on the engineering drawing at PAC
16 005063 were obtained by copying, replicating and/or referring to an engineering drawing
17 made by or for Beadex/USG.

18 **Response To Request For Admission No. 49:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is vague and ambiguous, overbroad, and compound. Subject to and without
22 waiving the foregoing objections, Award Metals responds as follows: Admit

23 **Request For Admission No. 50:**

24 Admit that the engineering drawing at PAC 005051 was created by copying,
25 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

26 **Response To Request For Admission No. 50:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is vague and ambiguous, overbroad, and compound. Subject to and without
2 waiving the foregoing objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 51:**

4 Admit that figures and dimensions described on the engineering drawing at PAC
5 005051 were obtained by copying, replicating and/or referring to an engineering drawing
6 made by or for Beadex/USG.

7 **Response To Request For Admission No. 51:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is vague and ambiguous, overbroad, and compound. Subject to and without
11 waiving the foregoing objections, Award Metals responds as follows: Admit.

12 **Request For Admission No. 52:**

13 Admit that the engineering drawing at PAC 005030 was created by copying,
14 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

15 **Response To Request For Admission No. 52:**

16 Award Metals incorporates by reference its General Objections and Objections to
17 Definitions and Instructions. Award Metals further objects to this Request on the grounds
18 that it is vague and ambiguous, overbroad, and compound. Subject to and without
19 waiving the foregoing objections, Award Metals responds as follows: Admit.

20 **Request For Admission No. 53:**

21 Admit that figures and dimensions described on the engineering drawing at PAC
22 005030 were obtained by copying, replicating and/or referring to an engineering drawing
23 made by or for Beadex/USG.

24 **Response To Request For Admission No. 53:**

25 Award Metals incorporates by reference its General Objections and Objections to
26 Definitions and Instructions. Award Metals further objects to this Request on the grounds
27 that it is vague and ambiguous, overbroad, and compound. Subject to and without
28 waiving the foregoing objections, Award Metals responds as follows: Admit.

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Request For Admission No. 54:

Admit that the engineering drawing at PAC 005042 was created by copying, replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

Response To Request For Admission No. 54:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is vague and ambiguous, overbroad, and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Admit.

Request For Admission No. 55:

Admit that figures and dimensions described on the engineering drawing at PAC 005042 were obtained by copying, replicating and/or referring to an engineering drawing made by or for Beadex/USG.

Response To Request For Admission No. 55:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is vague and ambiguous, overbroad, and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Admit.

Request For Admission No. 56:

Admit that the engineering drawing at PAC 005043 was created by copying, replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

Response To Request For Admission No. 56:

Award Metals incorporates by reference its General Objections and Objections to Definitions and Instructions. Award Metals further objects to this Request on the grounds that it is vague and ambiguous, overbroad, and compound. Subject to and without waiving the foregoing objections, Award Metals responds as follows: Admit.

Request For Admission No. 57:

Admit that figures and dimensions described on the engineering drawing at PAC

1 005043 were obtained by copying, replicating and/or referring to an engineering drawing
2 made by or for Beadex/USG.

3 **Response To Request For Admission No. 57:**

4 Award Metals incorporates by reference its General Objections and Objections to
5 Definitions and Instructions. Award Metals further objects to this Request on the grounds
6 that it is vague and ambiguous, overbroad, and compound. Subject to and without
7 waiving the foregoing objections, Award Metals responds as follows: Admit.

8 **Request For Admission No. 58:**

9 Admit that the engineering drawing at PAC 005050 was created by copying,
10 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

11 **Response To Request For Admission No. 58:**

12 Award Metals incorporates by reference its General Objections and Objections to
13 Definitions and Instructions. Award Metals further objects to this Request on the grounds
14 that it is vague and ambiguous, overbroad, and compound. Subject to and without
15 waiving the foregoing objections, Award Metals responds as follows: Admit.

16 **Request For Admission No. 59:**

17 Admit that figures and dimensions described on the engineering drawing at PAC
18 005050 were obtained by copying, replicating and/or referring to an engineering drawing
19 made by or for Beadex/USG.

20 **Response To Request For Admission No. 59:**

21 Award Metals incorporates by reference its General Objections and Objections to
22 Definitions and Instructions. Award Metals further objects to this Request on the grounds
23 that it is vague and ambiguous, overbroad, and compound. Subject to and without
24 waiving the foregoing objections, Award Metals responds as follows: Admit.

25 **Request For Admission No. 60:**

26 Admit that the engineering drawing at PAC 005053 was created by copying,
27 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

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1 **Response To Request For Admission No. 60:**

2 Award Metals incorporates by reference its General Objections and Objections to
3 Definitions and Instructions. Award Metals further objects to this Request on the grounds
4 that it is vague and ambiguous, overbroad, and compound. Subject to and without
5 waiving the foregoing objections, Award Metals responds as follows: Admit.

6 **Request For Admission No. 61:**

7 Admit that figures and dimensions described on the engineering drawing at PAC
8 005047 were obtained by copying, replicating and/or referring to an engineering drawing
9 made by or for Beadex/USG.

10 **Response To Request For Admission No. 61:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is vague and ambiguous, overbroad, and compound. Subject to and without
14 waiving the foregoing objections, Award Metals responds as follows: Admit.

15 **Request For Admission No. 62:**

16 Admit that the engineering drawing at PAC 005047 was created by copying,
17 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

18 **Response To Request For Admission No. 62:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is vague and ambiguous, overbroad, and compound. Subject to and without
22 waiving the foregoing objections, Award Metals responds as follows: Admit.

23 **Request For Admission No. 63:**

24 Admit that the engineering drawing at PAC 005040 was created by copying,
25 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

26 **Response To Request For Admission No. 63:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is vague and ambiguous, overbroad, and compound. Subject to and without
2 waiving the foregoing objections, Award Metals responds as follows: Admit.

3 **Request For Admission No. 64:**

4 Admit that figures and dimensions described on the engineering drawing at PAC
5 005040 were obtained by copying, replicating and/or referring to an engineering drawing
6 made by or for Beadex/USG.

7 **Response To Request For Admission No. 64:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is vague and ambiguous, overbroad, and compound. Subject to and without
11 waiving the foregoing objections, Award Metals responds as follows: Admit.

12 **Request For Admission No. 65:**

13 Admit that the engineering drawings at PAC 005579-005584 were created by
14 copying, replicating, and/or referring to an engineering drawing made by or for
15 Beadex/USG.

16 **Response To Request For Admission No. 65:**

17 Award Metals incorporates by reference its General Objections and Objections to
18 Definitions and Instructions. Award Metals further objects to this Request on the grounds
19 that it is vague and ambiguous, overbroad, and compound. Subject to and without
20 waiving the foregoing objections, Award Metals responds as follows: Deny.

21 **Request For Admission No. 66:**

22 Admit that figures and dimensions described on the engineering drawing at PAC
23 005579-005584 were obtained by copying, replicating and/or referring to engineering
24 drawings made by or for Beadex/USG.

25 **Response To Request For Admission No. 66:**

26 Award Metals incorporates by reference its General Objections and Objections to
27 Definitions and Instructions. Award Metals further objects to this Request on the grounds
28 that it is vague and ambiguous, overbroad, and compound. Subject to and without

1 waiving the foregoing objections, Award Metals responds as follows: Deny.

2 **Request For Admission No. 67:**

3 Admit that the engineering drawing at PAC 003400 (USG 05389) was created by
4 copying, replicating, and/or referring to an engineering drawing made by or for
5 Beadex/USG.

6 **Response To Request For Admission No. 67:**

7 Award Metals incorporates by reference its General Objections and Objections to
8 Definitions and Instructions. Award Metals further objects to this Request on the grounds
9 that it is vague and ambiguous, overbroad, and compound. Subject to and without
10 waiving the foregoing objections, Award Metals responds as follows: Deny.

11 **Request For Admission No. 68:**

12 Admit that the engineering drawing at PAC 003400 (USG 05389) is a
13 Beadex/USG engineering drawing.

14 **Response To Request For Admission No. 68:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is vague and ambiguous, overbroad, and compound. Subject to and without
18 waiving the foregoing objections, Award Metals responds as follows: Deny.

19 **Request For Admission No. 69:**

20 Admit that Award Metals used the engineering drawing at PAC 003400 (USG
21 05389) in the development of its labeling table for use in its paper faced corner bead line.

22 **Response To Request For Admission No. 69:**

23 Award Metals incorporates by reference its General Objections and Objections to
24 Definitions and Instructions. Award Metals further objects to this Request on the grounds
25 that it is vague and ambiguous, overbroad, and compound. Subject to and without
26 waiving the foregoing objections, Award Metals responds as follows: Deny.

27 **Request For Admission No. 70:**

28 Admit that the documents produced as PAC 003400-003402 are Beadex/USG

1 documents.

2 **Response To Request For Admission No. 70:**

3 Award Metals incorporates by reference its General Objections and Objections to
4 Definitions and Instructions. Award Metals further objects to this Request on the grounds
5 that it is vague and ambiguous, overbroad, and compound. Subject to and without
6 waiving the foregoing objections, Award Metals responds as follows: Deny.

7 **Request For Admission No. 71:**

8 Admit that the documents produced as PAC 003400-003402 were not originally
9 created by or for Award Metals.

10 **Response To Request For Admission No. 71:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is vague and ambiguous, overbroad, and compound. Subject to and without
14 waiving the foregoing objections, Award Metals responds as follows: Deny.

15 **Request For Admission No. 72:**

16 Admit that the documents produced as PAC 004755-0004780 are Beadex/USG
17 documents.

18 **Response To Request For Admission No. 72:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is vague and ambiguous, overbroad, and compound. Subject to and without
22 waiving the foregoing objections, Award Metals responds as follows: Deny.

23 **Request For Admission No. 73:**

24 Admit that the documents produced as PAC 004755-0004780 were not originally
25 created by or for Award Metals.

26 **Response To Request For Admission No. 73:**

27 Award Metals incorporates by reference its General Objections and Objections to
28 Definitions and Instructions. Award Metals further objects to this Request on the grounds

1 that it is vague and ambiguous, overbroad, and compound. Subject to and without
2 waiving the foregoing objections, Award Metals responds as follows: Deny.

3 **Request For Admission No. 74:**

4 Admit that the engineering drawing produced as PAC 004769 (USG 0545) was
5 produced by Andries Breedt for Beadex/USG.

6 **Response To Request For Admission No. 74:**

7 Award Metals incorporates by reference its General Objections and Objections to
8 Definitions and Instructions. Award Metals further objects to this Request on the grounds
9 that it is vague and ambiguous, overbroad, and compound. Subject to and without
10 waiving the foregoing objections, Award Metals responds as follows: Deny.

11 **Request For Admission No. 75:**

12 Admit that Award Metals uses a perform steel guide stationary bearing block in
13 the manufacture of its paper faced corner bead products.

14 **Response To Request For Admission No. 75:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is vague and ambiguous, particularly with respect to the terms "perform steel guide
18 stationary bearing block" and "paper faced corner bead products." In addition, Award
19 Metals objects to this Request on the grounds that it is overbroad. Subject to and without
20 waiving the foregoing objections, Award Metals responds as follows: Admit.

21 **Request For Admission No. 76:**

22 Admit that the perform steel guide stationary bearing block used by Award Metals
23 in manufacturing its paper faced corner bead products is structurally identical to the
24 perform steel guide stationary bearing block shown by PAC 4769 (USG 0545).

25 **Response To Request For Admission No. 76:**

26 Award Metals incorporates by reference its General Objections and Objections to
27 Definitions and Instructions. Award Metals further objects to this Request on the grounds
28 that it is vague and ambiguous, overbroad, and compound. Subject to and without

1 waiving the foregoing objections, Award Metals responds as follows: Deny.

2 **Request For Admission No. 77:**

3 Admit that figures and dimensions described on the engineering drawing at PAC
4 003400 (USG 05389) were obtained by copying, replicating and/or referring to an
5 engineering drawing made by or for Beadex/USG.

6 **Response To Request For Admission No. 77:**

7 Award Metals incorporates by reference its General Objections and Objections to
8 Definitions and Instructions. Award Metals further objects to this Request on the grounds
9 that it is vague and ambiguous, overbroad, and compound. Subject to and without
10 waiving the foregoing objections, Award Metals responds as follows: Deny.

11 **Request For Admission No. 78:**

12 Admit that the engineering drawing at PAC 005849 was created by copying,
13 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

14 **Response To Request For Admission No. 78:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is vague and ambiguous, overbroad, and compound. Subject to and without
18 waiving the foregoing objections, Award Metals responds as follows: Deny.

19 **Request For Admission No. 79:**

20 Admit that figures and dimensions described on the engineering drawing at PAC
21 005849 were obtained by copying, replicating and/or referring to an engineering drawing
22 made by or for Beadex/USG.

23 **Response To Request For Admission No. 79:**

24 Award Metals incorporates by reference its General Objections and Objections to
25 Definitions and Instructions. Award Metals further objects to this Request on the grounds
26 that it is vague and ambiguous, overbroad, and compound. Subject to and without
27 waiving the foregoing objections, Award Metals responds as follows: Deny.

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1 **Request For Admission No. 80:**

2 Admit that the engineering drawing at PAC 005847 was created by copying,
3 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

4 **Response To Request For Admission No. 80:**

5 Award Metals incorporates by reference its General Objections and Objections to
6 Definitions and Instructions. Award Metals further objects to this Request on the grounds
7 that it is vague and ambiguous, overbroad, and compound. Subject to and without
8 waiving the foregoing objections, Award Metals responds as follows: Deny.

9 **Request For Admission No. 81:**

10 Admit that figures and dimensions described on the engineering drawing at PAC
11 005847 were obtained by copying, replicating and/or referring to an engineering drawing
12 made by or for Beadex/USG.

13 **Response To Request For Admission No. 81:**

14 Award Metals incorporates by reference its General Objections and Objections to
15 Definitions and Instructions. Award Metals further objects to this Request on the grounds
16 that it is vague and ambiguous, overbroad, and compound. Subject to and without
17 waiving the foregoing objections, Award Metals responds as follows: Deny.

18 **Request For Admission No. 82:**

19 Admit that the engineering drawing at PAC 005848 was created by copying,
20 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

21 **Response To Request For Admission No. 82:**

22 Award Metals incorporates by reference its General Objections and Objections to
23 Definitions and Instructions. Award Metals further objects to this Request on the grounds
24 that it is vague and ambiguous, overbroad, and compound. Subject to and without
25 waiving the foregoing objections, Award Metals responds as follows: Deny.

26 **Request For Admission No. 83:**

27 Admit that figures and dimensions described on the engineering drawing at PAC
28 005848 were obtained by copying, replicating and/or referring to an engineering drawing

1 made by or for Beadex/USG.

2 **Response To Request For Admission No. 83:**

3 Award Metals incorporates by reference its General Objections and Objections to
4 Definitions and Instructions. Award Metals further objects to this Request on the grounds
5 that it is vague and ambiguous, overbroad, and compound. Subject to and without
6 waiving the foregoing objections, Award Metals responds as follows: Deny.

7 **Request For Admission No. 84:**

8 Admit that the engineering drawing at PAC 005012 was created by copying,
9 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

10 **Response To Request For Admission No. 84:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is vague and ambiguous, overbroad, and compound. Subject to and without
14 waiving the foregoing objections, Award Metals responds as follows: Admit.

15 **Request For Admission No. 85:**

16 Admit that figures and dimensions described on the engineering drawing at PAC
17 005012 were obtained by copying, replicating and/or referring to an engineering drawing
18 made by or for Beadex/USG.

19 **Response To Request For Admission No. 85:**

20 Award Metals incorporates by reference its General Objections and Objections to
21 Definitions and Instructions. Award Metals further objects to this Request on the grounds
22 that it is vague and ambiguous, overbroad, and compound. Subject to and without
23 waiving the foregoing objections, Award Metals responds as follows: Admit.

24 **Request For Admission No. 86:**

25 Admit that the engineering drawing at PAC 005013 was created by copying,
26 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

27 **Response To Request For Admission No. 86:**

28 Award Metals incorporates by reference its General Objections and Objections to

1 Definitions and Instructions. Award Metals further objects to this Request on the grounds
2 that it is vague and ambiguous, overbroad, and compound. Subject to and without
3 waiving the foregoing objections, Award Metals responds as follows: Admit.

4 **Request For Admission No. 87:**

5 Admit that figures and dimensions described on the engineering drawing at PAC
6 005013 were obtained by copying, replicating and/or referring to an engineering drawing
7 made by or for Beadex/USG.

8 **Response To Request For Admission No. 87:**

9 Award Metals incorporates by reference its General Objections and Objections to
10 Definitions and Instructions. Award Metals further objects to this Request on the grounds
11 that it is vague and ambiguous, overbroad, and compound. Subject to and without
12 waiving the foregoing objections, Award Metals responds as follows: Admit.

13 **Request For Admission No. 88:**

14 Admit that the engineering drawing at PAC 002490 was created by copying,
15 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

16 **Response To Request For Admission No. 88:**

17 Award Metals incorporates by reference its General Objections and Objections to
18 Definitions and Instructions. Award Metals further objects to this Request on the grounds
19 that it is vague and ambiguous, overbroad, and compound. Subject to and without
20 waiving the foregoing objections, Award Metals responds as follows: Deny.

21 **Request For Admission No. 89:**

22 Admit that figures and dimensions described on the engineering drawing at PAC
23 002490 were obtained by copying, replicating and/or referring to an engineering drawing
24 made by or for Beadex/USG.

25 **Response To Request For Admission No. 89:**

26 Award Metals incorporates by reference its General Objections and Objections to
27 Definitions and Instructions. Award Metals further objects to this Request on the grounds
28 that it is vague and ambiguous, overbroad, and compound. Subject to and without

1 waiving the foregoing objections, Award Metals responds as follows: Deny.

2 **Request For Admission No. 90:**

3 Admit that the engineering drawing at PAC 002505 was created by copying,
4 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

5 **Response To Request For Admission No. 90:**

6 Award Metals incorporates by reference its General Objections and Objections to
7 Definitions and Instructions. Award Metals further objects to this Request on the grounds
8 that it is vague and ambiguous, overbroad, and compound. Subject to and without
9 waiving the foregoing objections, Award Metals responds as follows: Deny.

10 **Request For Admission No. 91:**

11 Admit that figures and dimensions described on the engineering drawing at PAC
12 002505 were obtained by copying, replicating and/or referring to an engineering drawing
13 made by or for Beadex/USG.

14 **Response To Request For Admission No. 91:**

15 Award Metals incorporates by reference its General Objections and Objections to
16 Definitions and Instructions. Award Metals further objects to this Request on the grounds
17 that it is vague and ambiguous, overbroad, and compound. Subject to and without
18 waiving the foregoing objections, Award Metals responds as follows: Deny.

19 **Request For Admission No. 92:**

20 Admit that the engineering drawing at PAC 005016 was created by copying,
21 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

22 **Response To Request For Admission No. 92:**

23 Award Metals incorporates by reference its General Objections and Objections to
24 Definitions and Instructions. Award Metals further objects to this Request on the grounds
25 that it is vague and ambiguous, overbroad, and compound. Subject to and without
26 waiving the foregoing objections, Award Metals responds as follows: Admit.

27 **Request For Admission No. 93:**

28 Admit that figures and dimensions described on the engineering drawing at PAC

1 005016 were obtained by copying, replicating and/or referring to an engineering drawing
2 made by or for Beadex/USG.

3 **Response To Request For Admission No. 93:**

4 Award Metals incorporates by reference its General Objections and Objections to
5 Definitions and Instructions. Award Metals further objects to this Request on the grounds
6 that it is vague and ambiguous, overbroad, and compound. Subject to and without
7 waiving the foregoing objections, Award Metals responds as follows: Admit.

8 **Request For Admission No. 94:**

9 Admit that the engineering drawing at PAC 005018 was created by copying,
10 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

11 **Response To Request For Admission No. 94:**

12 Award Metals incorporates by reference its General Objections and Objections to
13 Definitions and Instructions. Award Metals further objects to this Request on the grounds
14 that it is vague and ambiguous, overbroad, and compound. Subject to and without
15 waiving the foregoing objections, Award Metals responds as follows: Admit.

16 **Request For Admission No. 95:**

17 Admit that figures and dimensions described on the engineering drawing at PAC
18 005018 were obtained by copying, replicating and/or referring to an engineering drawing
19 made by or for Beadex/USG.

20 **Response To Request For Admission No. 95:**

21 Award Metals incorporates by reference its General Objections and Objections to
22 Definitions and Instructions. Award Metals further objects to this Request on the grounds
23 that it is vague and ambiguous, overbroad, and compound. Subject to and without
24 waiving the foregoing objections, Award Metals responds as follows: Admit.

25 **Request For Admission No. 96:**

26 Admit that the engineering drawing at PAC 005083 was created by copying,
27 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

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1 **Response To Request For Admission No. 96:**

2 Award Metals incorporates by reference its General Objections and Objections to
3 Definitions and Instructions. Award Metals further objects to this Request on the grounds
4 that it is vague and ambiguous, overbroad, and compound. Subject to and without
5 waiving the foregoing objections, Award Metals responds as follows: Admit.

6 **Request For Admission No. 97:**

7 Admit that figures and dimensions described on the engineering drawing at PAC
8 005083 were obtained by copying, replicating and/or referring to an engineering drawing
9 made by or for Beadex/USG.

10 **Response To Request For Admission No. 97:**

11 Award Metals incorporates by reference its General Objections and Objections to
12 Definitions and Instructions. Award Metals further objects to this Request on the grounds
13 that it is vague and ambiguous, overbroad, and compound. Subject to and without
14 waiving the foregoing objections, Award Metals responds as follows: Admit.

15 **Request For Admission No. 98:**

16 Admit that the engineering drawing at PAC 001079 was created by copying,
17 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

18 **Response To Request For Admission No. 98:**

19 Award Metals incorporates by reference its General Objections and Objections to
20 Definitions and Instructions. Award Metals further objects to this Request on the grounds
21 that it is vague and ambiguous, overbroad, and compound. Subject to and without
22 waiving the foregoing objections, Award Metals responds as follows: Deny.

23 **Request For Admission No. 99:**

24 Admit that figures and dimensions described on the engineering drawing at PAC
25 001079 were obtained by copying, replicating and/or referring to an engineering drawing
26 made by or for Beadex/USG.

27 **Response To Request For Admission No. 99:**

28 Award Metals incorporates by reference its General Objections and Objections to

1 Definitions and Instructions. Award Metals further objects to this Request on the grounds
2 that it is vague and ambiguous, overbroad, and compound. Subject to and without
3 waiving the foregoing objections, Award Metals responds as follows: Deny.

4 **Request For Admission No. 100:**

5 Admit that the engineering drawing at PAC 005586 was created by copying,
6 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

7 **Response To Request For Admission No. 100:**

8 Award Metals incorporates by reference its General Objections and Objections to
9 Definitions and Instructions. Award Metals further objects to this Request on the grounds
10 that it is vague and ambiguous, overbroad, and compound. Subject to and without
11 waiving the foregoing objections, Award Metals responds as follows: Deny.

12 **Request For Admission No. 101:**

13 Admit that figures and dimensions described on the engineering drawing at PAC
14 005586re obtained by copying, replicating and/or referring to an engineering drawing
15 made by or for Beadex/USG.

16 **Response To Request For Admission No. 101:**

17 Award Metals incorporates by reference its General Objections and Objections to
18 Definitions and Instructions. Award Metals further objects to this Request on the grounds
19 that it is vague and ambiguous, overbroad, and compound. Subject to and without
20 waiving the foregoing objections, Award Metals responds as follows: Deny.

21 **Request For Admission No. 102:**

22 Admit that the engineering drawing at PAC 005601 was created by copying,
23 replicating, and/or referring to an engineering drawing made by or for Beadex/USG.

24 **Response To Request For Admission No. 102:**

25 Award Metals incorporates by reference its General Objections and Objections to
26 Definitions and Instructions. Award Metals further objects to this Request on the grounds
27 that it is vague and ambiguous, overbroad, and compound. Subject to and without
28 waiving the foregoing objections, Award Metals responds as follows: Deny.