

Exhibit 11

HAUSFELD

888 16th Street, N.W.
Suite 300
Washington, DC 20006

Melinda Coolidge
US Managing Partner
E: mcoolidge@hausfeld.com
T: 202.540.7144

March 19, 2024

CONFIDENTIAL
VIA ELECTRONIC MAIL

Gabriel J. Lazarus, Esq.
Cleary Gottlieb Steen & Hamilton LLP
2112 Pennsylvania Avenue, NW
Washington, DC 20037
glazarus@cgsh.com

Logan Breed, Esq.
Hogan Lovells LLP
555 13th Street, NW
Washington, DC 20004
logan.breed@hoganlovells.com

Re: *U.S. v. ASSA ABLOY AB, et al.*, Case No. 1:22-cv-02791-ACR

Dear Gabriel and Logan,

As the Monitoring Trustee in the above-captioned action, I write to ask ASSA ABLOY AB (“ASSA ABLOY”) to produce certain documents and information. As always, the Monitoring Trustee is bound by the Protective Order and will treat any documents and information produced by ASSA ABLOY as “Confidential Information” pursuant to the “Engagement Agreement for Services of Melinda R. Coolidge as Monitoring Trustee” between the Monitoring Trustee and ASSA ABLOY, which was adopted pursuant to Section X.D of the Final Judgment.

The Monitoring Trustee Team’s specific requests are enclosed with this letter, and we ask ASSA ABLOY to respond to these requests by the specific dates provided below.

Please let me know if you have any questions about the requests or if you identify any potential hardships associated with formulating ASSA ABLOY’s responses (including concerns regarding potential claims of privilege or the burdens of compliance).

Very truly yours,

/s/ Melinda R. Coolidge

Melinda R. Coolidge

hausfeld.com

AMSTERDAM | BERLIN | BOSTON | BRUSSELS | DÜSSELDORF | LONDON | NEW YORK | PHILADELPHIA |
SAN FRANCISCO | STOCKHOLM | WASHINGTON, DC

DOCUMENT REQUESTS DIRECTED TO ASSA ABLOY

Document Request AA DR 16 (Recurring)

Provide all electronic databases showing all transactions (on an individual transaction-by-transaction basis) from January 1, 2022, to the present in which you sold a Smart Lock product to any purchaser in the United States. The data provided should be in its native, machine-readable format and should include, but not be limited to, the following information:

Invoice/Transaction ID

- 1) purchase/sale order number;
- 2) the date the purchase order was issued;
- 3) the invoice number;
- 4) the date when you billed and/or invoiced the Smart Locks to the purchaser;
- 5) the terms of each such transaction; and
- 6) information sufficient to separate intra-company transactions from sales to external customers.

Product

- 7) the brand name, specifications, types, connectivity (e.g., Bluetooth, Wi-Fi, Z-wave), use case (e.g., privacy, passageway), and/or finish of Smart Lock, including but not limited to SKU, part numbers, any unique purchaser-specific identifier, and complete product descriptions, you sold in connection with each such transaction;
- 8) the product groupings and/or hierarchy used by ASSA ABLOY to categorize Smart Locks in the ordinary course of business;
- 9) the end use of the Smart Locks sold (e.g., whether residential, commercial, or any other categorizations you use in the ordinary course of business); and
- 10) ASSA ABLOY's business unit ID and name associated with the Smart Lock sale.

Amount

- 11) the quantity of Smart Locks sold in connection with each such transaction;
- 12) the unit of measure for quantity fields;
- 13) the list and net unit price of the Smart Locks sold in connection with each such transaction;
- 14) whether the unit prices listed include any freight, taxes, or other charges and, if so, a breakout of those charges;
- 15) any discounts, rebates, credits, freight allowances, free goods and/or services, and/or any other pricing adjustments you made in connection with each such transaction, with sufficient information to attribute/allocate these pricing adjustments back to individual transactions;
- 16) the gross and net total amount paid for the Smart Locks sold in connection with each such transaction;
- 17) the currency and exchange rate information for pricing and value fields, if not US Dollars; and
- 18) any costs (e.g., total and per-unit variable costs, fixed costs, semi-variable costs, marginal costs,

standard costs) to you associated with the Smart Locks.

Customer/Purchaser

- 19) the name, number/ID, and location (city/state) of the purchaser to whom you shipped or delivered the Smart Locks;
- 20) the name, number/ID, and location (city/state) of the purchaser billed for the Smart Locks;
- 21) the name, number/ID, and location (city/state) of the purchaser to whom you sold the Smart Locks;
- 22) the name and number/ID of the parent company, when applicable;
- 23) whether the purchaser is a residential, commercial, or other customer;
- 24) whether the purchaser is a retailer, wholesaler, builder, dealer, integrator, or other customer.
- 25) any other information maintained in the ordinary course of business to categorize customers (e.g., market segment, customer tier); and
- 26) the suggested retail price of the Smart Locks you sold in connection with each such transaction.

Other information

- 27) any other information associated with the transaction(s) tracked in the normal course of business in your electronic databases; and
- 28) all documents related to the entry, maintenance, and/or interpretation of electronic data identified above, including, without limitation, a data dictionary or any other document containing a clear description of each field found in any electronic database.

Some of the requested information may reside in separate databases or tables within ASSA ABLOY's data warehouses. If such data are produced as separate tables/databases, please ensure corresponding IDs/crosswalks necessary to link the tables/databases are included.

Requested Due Date: 5pm ET on Thursday April 18, 2024; and twice a year thereafter provide updated extracts covering the last six months of sales.