

EXHIBIT B

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 UNILOC 2017 LLC, 14 Plaintiff, 15 v. 16 NETSUITE, INC., 17 Defendant.	Civil Action No. 8:19-cv-01151-JLS-DFM UNILOC 2017’S REQUEST TO DEFENDANT FOR PRODUCTION OF DOCUMENTS AND ELECTRONICALLY STORED INFORMATION
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18 Under Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff, Uniloc 2017
19 LLC, requests Defendant, Netsuite, Inc., produce the Documents described below.

20 The capitalized “Documents” is used as shorthand for “documents or electronically stored
21 information,” as described in Federal Rules of Civil Procedure 34(a)(1)(A):

22 (A) Any designated documents or electronically stored information--including
23 writings, drawings, graphs, charts, photographs, sound recordings, images, and
24 other data or data compilations--stored in any medium from which information
can be obtained either directly or, if necessary, after translation by the responding
party into a reasonably usable form.

25 By “Accused Products” is meant the products, devices, and services identified in the
26 Complaint.

27 The production should be completed by 30 days after service of this Request. See Federal
28 Rule of Civil Procedure 26(d)(2)(B).

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REQUEST

REQUEST NO. 1:

High and low-level technical Documents sufficient to completely describe the structure, functions, features, characteristics, capabilities, and operation of the Accused Products, as relevant to the Patents-in-Suit.

Dated: August 8, 2019

/s/ James J. Foster

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CERTIFICATE OF SERVICE

I certify that on August 8, 2019, I served this document on Defendant by causing a copy to be sent via electronic mail to its counsel of record.

/s/ James J. Foster