

# EXHIBIT C

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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12 SANTA ANA DIVISION  
13

14 UNILOC 2017 LLC, 15 Plaintiff, 16 v. 17 NETSUITE, INC., 18 Defendant.	CASE NO. 8:19-cv-01151-JLS-DFM  <b>UNILOC 2017'S SECOND  REQUEST TO DEFENDANT FOR  PRODUCTION OF DOCUMENTS  AND ELECTRONICALLY  STORED INFORMATION</b>
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19 Under Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff,  
20 Uniloc 2017 LLC, requests Defendant produce the Documents described below.

21 The capitalized "Documents" is used as shorthand for "documents or  
22 electronically stored information," as described in Federal Rules of Civil Procedure  
23 34(a)(1)(A):

24 (A) Any designated documents or electronically stored information--  
25 including writings, drawings, graphs, charts, photographs, sound recordings,  
26 images, and 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.

27 By "Accused Products" is meant the products, devices, and services identified  
28 in the Complaint.

1 The production should be completed by 30 days after service of these  
2 Requests. *See* Federal Rules of Civil Procedure 26(d)(2)(B).

3 **REQUESTS**

4 **REQUEST 1:**

5 For all versions of each Accused Product, documents sufficient to identify A)  
6 yearly sales, revenues, income, and profits, B) units sold or otherwise distributed, C)  
7 sale price, D) licensing terms, E) cost of goods sold/licensed, F) gross and net profit  
8 margins.

9 **REQUEST 2:**

10 Licenses, patent licenses, settlement agreements, covenants not to sue, or  
11 other agreements that you have entered into relating to the Accused Products with  
12 respect to the accused or similar functionality.

13 **REQUEST 3:**

14 All documents concerning marketing of the Accused Products, including all  
15 versions thereof, and the marketing of any products making use of or otherwise  
16 incorporating the accused functionality.

17  
18 Dated: October 4, 2019

19 */s/ James J. Foster*

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CERTIFICATE OF SERVICE

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I certify that on October 4, 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