

Filed on behalf of:

Patent Owner Sightsound

Paper No. _____

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE Inc.

Petitioner

v.

SIGHTSOUND TECHNOLOGIES, LLC,

Patent Owner

Case CBM2013-00020
Patent 5,191,573

FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE THAT pursuant to 37 C.F.R. § 42.224(a), Patent Owner SightSound Technologies LLC hereby requests the production of documents as kept in the ordinary course of business by Petitioner Apple, Inc. (“Apple”).

For purposes of these requests, the “iTunes Music Store” or “iTMS” refers to the online service operated by Apple for the download of digital content launched on April 28, 2003.

REQUEST NO. 1

The expert report and accompanying exhibits of J. Douglas Tygar concerning infringement, dated April 22, 2013.

REQUEST NO. 2

Non-public specifications, schematics, or other documentation sufficient to show how Apple accessed digital audio or video signals from memory and transferred them over telecommunications lines for sale to consumers via the iTunes Music Store (“iTMS”) at the time of the launch of the iTMS.

REQUEST NO. 3

Non-public specifications, schematics, or other documentation sufficient to show how customers purchased digital audio or video signals and stored such signals in memory via the iTMS at the time of the launch of the iTMS.

REQUEST NO. 4

Surveys conducted by or for Apple from 2003 to 2007 reflecting consumers' desire to purchase digital audio or video signals via telecommunications lines, including through the iTunes.

Dated: November 15, 2013

/David R. Marsh/

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