

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In re U.S. Patent No. 6,240,376 Application No.: 09/127,587 Filed: July 31, 1998 Issued: May 29, 2001 Inventors: Alain Raynaud Luc M. Burgun Patent Owner: Mentor Graphics Corporation For: METHOD AND APPARATUS FOR GATE-LEVEL SIMULATION OF SYNTHESIZED REGISTER TRANSFER LEVEL DESIGNS WITH SOURCE-LEVEL DEBUGGING	Trial No.: IPR 2012-00042 Atty. Dkt. No. 007121.00004
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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

**[PROPOSED] PATENT OWNER'S INTERROGATORIES TO
PETITIONER**

Pursuant to the Board's authorization, Patent Owner Mentor Graphics Corporation ("Mentor Graphics") hereby requests that Synopsys, Inc. ("Synopsys") respond, separately and fully in writing and under oath, to each of the following interrogatories. Mentor Graphics requests that Synopsys deliver written responses to each of these interrogatories to the offices of Banner & Witcoff, Ltd, 1100 13th Street, NW, Suite 1200, Washington, DC 20005, within fourteen (14) calendar days of the service date hereof.

DEFINITIONS

As used herein, the following words shall have the meanings indicated:

1. "**Mentor Graphics**" means Patent Owner Mentor Graphics Corporation, as well as its subsidiaries, divisions, affiliates, assigns, present and former officers, directors, employees, related corporations and agents.
2. "**Synopsys**" means Synopsys, Inc. and all of its subsidiaries, divisions, affiliates, assigns, present and former officers, directors, and employees, related corporations and agents.
3. "**EVE**" means Emulation and Verification Engineering, S.A. (now named Synopsys Emulation and Verification S.A.) and EVE-USA, Inc., and all of their subsidiaries, divisions, affiliates, assigns, present and former officers, directors, employees, related corporations and agents.
4. "**376 Patent**" means U.S. Patent No. 6,240,376.

5. “**Burgun**” means Luc Burgun, named co-inventor of the '376 Patent.
6. “**Communication**” means every manner or method of disclosure or transfer or exchange of information, whether orally or by document, and whether face to face, by telephone, mail, email, personal delivery or otherwise. Unless otherwise indicated, a request calling for communications includes internal communications as well as communications with a third person.

INSTRUCTIONS

In the event any information is withheld on a claim of attorney/client privilege, work product immunity, or any other claim of privilege or immunity, describe the nature and basis for Synopsys' claim, identify the requested information that is being withheld with sufficient particularity to enable a claim of privilege or immunity to be adjudicated, and cite any authority which Synopsys asserts supports any claim of privilege or immunity. If the contents of a communication are being withheld, then identify the date of the communication, all recipients, and the general subject matter of the communication. If a legal objection based on a claim of privilege or immunity from disclosure applies only to a part of an interrogatory, but not its entirety, state the part to which the claim of privilege or immunity applies and answer the remainder of the interrogatory.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each attorney, agent, officer, or employee of EVE who provided assistance, input or materials used in preparing the *inter partes* review of the '376 Patent, by providing (i) the name of the attorney, agent, officer, or employee of EVE, (ii) a description of the assistance, input, or materials provided, and (iii) the date on which the assistance, input or materials were provided.

INTERROGATORY NO. 2:

Separately for each reference identified by Synopsys as providing a statutory ground for the *inter partes* review of the '376 Patent, identify whether the reference was identified to Synopsys as relevant to the '376 patent by any attorney, agent, officer, or employee of EVE.

INTERROGATORY NO. 3:

Identify any issues or circumstances that prevented Synopsys and EVE from executing on or before September 26, 2012, the agreement executed on September 27, 2012, by which Synopsys and EVE agreed to Synopsys' acquisition of EVE.

INTERROGATORY NO. 4:

Identify Burgun's job title(s) at Synopsys and describe his role and responsibilities from the time when he first became a board member, officer and/or employee of Synopsys to the date of this interrogatory.

INTERROGATORY NO. 5:

Identify Burgun's ownership interest in Synopsys, including, but not limited to, shares of stock, and any options, warrants, and/or any other rights to acquire Synopsys stock that Burgun owns or is entitled to own.

INTERROGATORY NO. 6:

Identify the date on which Synopsys and EVE first shared a common interest with respect to *inter partes* review of the '376 Patent.

INTERROGATORY NO. 7:

Identify any executive or board level decisions by EVE and/or Synopsys made prior to October 4, 2012, in reliance on the anticipated consummation of Synopsys' acquisition of EVE, including but not limited to: changes to corporate structure or governance, changes in employees, capital expenditures or commitments to capital expenditures, and leases or purchases of real property.

INTERROGATORY NO. 8:

Identify all agreements between Synopsys and EVE, or communications, regarding joint business activities predating October 4, 2012 of the two entities relating to the ZeBu line of emulation products.

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