

**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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Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

**[PROPOSED] PATENT OWNER'S REQUESTS FOR ADMISSION
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 requests for admission. Mentor Graphics requests that Synopsys deliver written responses to each of these requests for admission 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. **“Privity”** means the word “privity” as used in 35 U.S.C. § 315.
7. **“Real party in interest”** means the word “real party interest” as used in 35 U.S.C. § 315.
8. **“2006 Settlement Agreement”** means the Settlement Agreement and Mutual Release entered into between Mentor Graphics Corporation and Emulation and Verification Engineering, SA and EVE-USA, Inc., effective December 21, 2006, including any associated agreements.
9. **“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

A matter is admitted unless, within 14 days after being served, Synopsys serves on Mentor Graphics, as specified above, a written answer addressed to the matter and signed by the party or its attorney. A shorter or longer time for responding may be stipulated to or be ordered by the Board.

If a matter is not admitted, the answer must specifically deny it or state in detail why Synopsys cannot truthfully admit or deny it. A denial must fairly

respond to the substance of the matter; and when good faith requires that Synopsys qualify an answer or deny only a part of a matter, the answer must specify the part admitted and qualify or deny the rest. Synopsys may assert lack of knowledge or information as a reason for failing to admit or deny only if Synopsys states that it has made reasonable inquiry and that the information it knows or can readily obtain is insufficient to enable it to admit or deny.

REQUESTS FOR ADMISSION

REQUEST NO. 1:

Admit EVE is a wholly-owned subsidiary of Synopsys.

REQUEST NO. 2:

Admit that Synopsys and EVE are in privity with respect to the subject matter and outcome of the litigation resulting in the 2006 Settlement Agreement, as of the date of filing the 2006 complaint that initiated said litigation.

REQUEST NO. 3:

Admit that Synopsys and EVE are in privity with respect to the subject matter and outcome of the litigation resulting in the 2006 Settlement Agreement, as of September 26, 2012.

REQUEST NO. 4:

Admit that Synopsys and EVE are in privity with respect to the subject matter and outcome of the litigation resulting in the 2006 Settlement Agreement, as of September 27, 2012.

REQUEST NO. 5:

Admit that Synopsys and EVE are in privity with respect to the subject matter and outcome of the litigation resulting in the 2006 Settlement Agreement, as of October 4, 2012.

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