

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIPNET EU S.R.O.
Petitioner

v.

Straight Path IP Group, Inc.
Patent Owner

Case No. IPR2013-00246
U.S. Patent No. 6,108,704

Before KLAYAN K. DESHPANDE, THOMAS L. GIANNETTI, and
TRENTON A. WARD, Administrative Patent Judges.

**PETITIONER'S RESPONSE TO PATENT OWNER'S NARROWED
DISCOVERY REQUESTS OF DEC. 6, 2013**

Case No. IPR2013-00246
U.S. Patent 6,108,704

INTERROGATORY NO. 1

Please identify anyone on behalf of Petitioner, including but not limited to Petitioner's counsel, who has communicated or is communicating with Stalker Software about the '704 Patent and/or the present Inter Partes Review and describe the specific nature of those communications.

German Myzovsky of Sipnet was contacted by Stalker Software, Inc. in January 2012 and he was informed about the filed complaint.

In October 2012 German Myzovsky contacted Stalker Software, Inc. and asked for a copy of the "Microsoft Windows NT Server 3.5, TCP/IP manual" referred to in the litigation. An electronic copy was provided to him.

German Myzovsky was also contacted by Stalker Software, Inc. in December 2012 and he was informed that the case was settled, that a license for the CommuniGate Pro software had been obtained, and that '704 patent invalidation was not discussed in court.

INTERROGATORY NO. 2

Please identify how and when Petitioner became first aware of the '704 Patent.

As described in the answer to Interrogatory #1, in January 2012 Petitioner was notified by Stalker Software, Inc. about a complaint filed by Patent Owner alleging '704 patent infringement by the CommuniGate Pro communication software.

INTERROGATORY NO. 3

Please identify or classify the relationship that Petitioner has with Stalker Software, including, but not limited to, an agency relationship, a licensee/licensor relationship, a customer-service provider relationship, or a parent company-subsidary relationship.

Stalker Software, Inc. is a vendor of the CommuniGate Pro communication product employed in some of Sipnet EU systems and offerings. Sipnet EU is a licensee of that product.

INTERROGATORY NO. 4

Please identify all shareholders, owners, and/or persons with controlling interests of Sipnet who are also shareholders, owners, and/or persons with controlling interests in Stalker Software.

None.

Requests for Production:

REQUEST NO. 1

All communications with Stalker Software, CommuniGate Pro, or their representatives relating to the '704 Patent and/or this inter partes review, including but not limited to communication regarding the WINS reference and/or the provision of suggestion of any printed publications, legal arguments, facts, claim constructions, claim charts, drafts, exhibits or documents, or any other technical and/or legal input for this inter partes review.

See the response to Interrogatory #1. All communications were oral.

REQUEST NO. 2

All contracts, agreements, or licenses between Sipnet and Stalker Software that relate to CommuniGate Pro, the '704 patent, and/or this inter partes review.

There are no such documents relating to the '704 patent and this *inter partes* review. The agreements relating to CommuniGate Pro are basically generic licensing agreements, but contain confidentiality clauses and confidential payment numbers. Petitioner objects to production of the CommuniGate Pro license agreements as not pertinent to this *inter partes* review and as including confidential information.

REQUEST NO. 3

Documents sufficient to show payment, funding, financial assistance, or other monetary contributions from Stalker Software, CommuniGate Pro, or their representatives to Petitioner and/or Petitioner's counsel in connection with any filings in the present inter partes Review and/or the '704 Patent.

There are no such documents as there are no such payment, funding, financial assistance or other monetary contributions.

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