

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT AND TRIAL APPEAL BOARD

UNIFIED PATENTS, INC.

Petitioner

v.

CLOUDING IP, LLC

Patent Owner

Case IPR2013-00586

Patent 6,738,799

PATENT OWNER'S PROPOSED INTERROGATORIES
FOR ADDITIONAL DISCOVERY

Pursuant to the Board's Order dated April 30, 2014, Paper 13, Patent Owner, Clouding IP, LLC, hereby submits its proposed interrogatories to Petitioner, Unified Patents, Inc.

I. Definitions:

- A. '799 PATENT means U.S. Patent No. 6,738,799.
- B. CLOUD STORAGE MICRO-POOL means the micro-pool launched by UNIFIED directed to "Cloud Storage" as described in UNIFIED's press releases dated September 17, 2013, Ex. 2003, and September 23, 2013, Ex. 2005.
- C. CLOUDING means Clouding IP, LLC.
- D. COMMUNICATIONS means the transmission or receipt of information of any kind through any means (e.g., email, text message, voicemail, audio, computer readable media, or orally).
- E. GOOGLE means Google Inc. and includes any affiliate, officer, director, employee, agent, representative, privies, intermediaries or others authorized to act on behalf of Google Inc.
- F. IPR means IPR2013-00586.
- G. MEMBERS means the members of UNIFIED (e.g., as so designated here on

UNIFIED'S website: <http://unifiedpatents.com/2014/04/17/unified-granted-inter-partes-review-ipr-on-ipnav-clouding-ip-patent>) or, with respect to the CLOUD STORAGE MICRO-POOL members of such pool.

H. UNIFIED means Unified Patents, Inc. and includes any shareholder, officer, director, employee, agent, representative, privies, intermediaries or other individual authorized to act on behalf of Unified Patents, Inc.

I. USPTO means the Unites States Patent and Trademark Office.

J. YEARLY SUBSCRIPTION FEES means the funding received from MEMBERS (e.g., as indicated on UNIFIED'S Website: <http://unifiedpatents.com/#whatwedo>).

II. Interrogatories:

1. Provide (i) the total amount of YEARLY SUBSCRIPTION FEES or other amounts paid by all MEMBERS to each of (a) UNIFIED and (b) separately, the CLOUDING STORAGE MICRO-POOL in calendar years 2012 and 2013, and (ii) the total amount of all YEARLY SUBSCRIPTION FEES or other amounts paid by GOOGLE to each of (a) UNIFIED and (b) separately, the CLOUDING STORAGE MICRO-POOL in calendar years 2012 and 2013.

2. Identify (i) the total amount and source of any cash amounts received by or paid to UNIFIED or the CLOUD STORAGE MICRO-POOL relating in any way to any challenge to the validity of any claim of the '799 PATENT, including payments relating to the preparation, editing, review, approval, and/or filing of any papers related to the IPR; and (ii) the percentage of said payments identified in part (i) received from GOOGLE.

3. Identify COMMUNICATIONS between UNIFIED or the CLOUD STORAGE MICRO POOL and GOOGLE relating to CLOUDING or the '799 PATENT, including any COMMUNICATIONS relating to challenging the validity of the '799 PATENT and COMMUNICATIONS relating to the financing, preparation, editing, review, approval, and or filing of the IPR.

4. Identify all individuals known to UNIFIED or the CLOUD STORAGE MICRO POOL that participated or assisted in any way with the financing, preparation, editing, review, approval, and/or filing of the IPR, including any individuals acting for or on behalf of GOOGLE.

5. State (i) whether or not UNIFIED will permit the use of all items of discovery (including deposition transcripts, responses to interrogatories and documents produced in response to subpoena or otherwise) regarding UNIFIED that was or is obtained in Civil Action No. 12-0639-LPS (DED) in the IPR, provided such items of discovery are subject to a protective order in the IPR and (ii) if not, the basis for denying such request.

Dated: May 6, 2014

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Respectfully submitted,

/Tarek N. Fahmi/

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Reg. No. 41,402

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