

# Exhibit 2118

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WAVEMARKET, INC. D/B/A LOCATION LABS  
Petitioner

v.

LOCATIONET SYSTEMS, LTD.  
Patent Owner

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Case No. IPR2014-00920  
U.S. Patent 6,771,970

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**PATENT OWNER'S PROPOSED DISCOVERY REQUESTS  
TO PETITIONER**

Patent Owner, LocatioNet Systems, Ltd. requests that Petitioner, Wavemarket, Inc. d/b/a Location Labs, respond and produce the following documents and things.

### **INSTRUCTIONS**

1. In responding to and producing documents responsive to this request, the responding party shall comply with the instructions in the Patent Trial Practice Guide.
2. A responding party shall timely amend its response upon learning that its response is incomplete or if additional responsive information is found.
3. All responsive documents must be produced as they are kept in the usual course of business.
4. A party is not required to produce document or information subject to a claim of privilege, including attorney work product. A party withholding responsive documents or information on the basis of privilege shall provide a privilege log identifying the responsive documents being withheld.
5. The production of responsive documents or information shall not constitute an express or implied waiver of any privilege held by the producing party.

## DEFINITIONS

1. The term “Petitioner” means Wavemarket, Inc. d/b/a Location Labs and includes any and all affiliates, divisions, agents, employees, representatives, directors, officers, or any other person or entity acting on behalf of Wavemarket, Inc. or Location Labs.

2. The term “AT&T” means AT&T Mobility, LLC and includes any and all affiliates, divisions, agents, employees, representatives, directors, officers, or any other person or entity acting on behalf of the foregoing.

3. The term “Sprint” means Sprint Nextel Corp. and includes any and all affiliates, divisions, agents, employees, representatives, directors, officers, or any other person or entity acting on behalf of the foregoing.

4. The term “T-Mobile” means T-Mobile USA Inc. and includes any and all affiliates, divisions, agents, employees, representatives, directors, officers, or any other person or entity acting on behalf of the foregoing.

5. The term “Delaware Litigation” means, either individually or collectively, the cases filed in the Federal District Court for the District of Delaware with the following docket numbers: 1:12-cv-1701-RGA, 1:12-cv-1702-RGA and 1:12-cv-1703-RGA.

6. The term “Document” has the meaning prescribed in Federal Rule of Civil Procedure 34, including, but not limited to, electronically stored information in the responding party’s possession, custody or control.

7. The term “Communications” shall mean the transmission or receipt of information through any means including voice, text, or any other telecommunication whether oral or visual.

8. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

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