

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARRIS GROUP, INC.
Petitioner

v.

C-CATION TECHNOLOGIES, LLC
Patent Owner

CASE IPR2015-00635
Patent 5,563,883

**C-CATION TECHNOLOGIES, LLC'S PROPOSED DISCOVERY
REQUEST TO ARRIS GROUP, INC.**

Patent Owner C-Cation Technologies, LLC requests that petitioner Arris Group, Inc. respond and produce the following documents and things.

INSTRUCTIONS

1. In responding to and producing documents and things 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.

DEFINITIONS

1. The term “document” has the broadest meaning prescribed in Federal Rule of Civil Procedure 34, including ESI in the responding party’s possession, custody, or control.

2. The term “Arris” means Arris Group, Inc. and includes any employees, agents, counsel, representatives, or others authorized to act on Arris’s behalf.

3. The term “Texas Litigation” means the lawsuit entitled *C-Cation Techs., LLC v. Comcast Corp., et al.*, Case No. 2:11-cv-00030-JRG-RSP, filed by

C-Cation Technologies, LLC in the United States District Court for the Eastern District of Texas.

4. The term “Comcast” means Comcast Corporation, Comcast Cable Communications, LLC, and Comcast of Houston LLC, and includes any employees, agents, counsel, representatives, or others authorized to act on behalf of those entities.

REQUEST FOR PRODUCTION

Request for Production No. 1

Agreement(s) between Arris and Comcast under which Comcast requested indemnification for the claims brought against Comcast in the Texas Litigation that reference (or are contingent on) Arris's ability to control the litigation.