

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
PATENT TRIAL AND APPEAL BOARD**

PRONG, INC.  
Petitioner

v.

YEOSHUA SORIAS  
Patent Owner

*Inter Partes Review*

*Case No. IPR2015-01317  
U.S. Patent No. 8,712,486*

**PATENT OWNER'S PROPOSED FIRST SET OF  
REQUESTS FOR ADMISSION TO PETITIONER**

Patent Owner Yeoshua Sorias (“Sorias”) requests that Petitioner Prong Inc. (“Prong”) respond to the following Request for Admission on or before the expiration of fourteen (14) days from the date of service of these requests, or at such other time as the parties may agree or the Board may order.

### **Definitions and Instructions**

1. The term “Prong” means Petitioner Prong, Inc. (f/k/a Prong, LLC) and includes, without limitation, all affiliates, related companies, parent companies, predecessors, divisions, subsidiaries, assigns, and successors in interest thereof, including but not limited to Anthem Grand LLC, and all other persons acting or purporting to act on behalf of it, including but not limited to Mr. Jesse Pliner and Mr. Lloyd Gladstone

### **Requests For Admission**

#### **Request for Admission No. 1**

Admit that the Forefront Law Group was acting on behalf of Prong (whether directly or indirectly) when it approached Mr. Max Moskowitz in February, 2012 on behalf of an anonymous client interested in purchasing U.S. Patent Application Serial No. 13/348,066.

Case No. IPR2015-01317  
U.S. Patent No. 8,712,486

Date \_\_\_\_\_

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For Patent Owner

Mr. Yeoshua Sorias