

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RPX CORPORATION,  
Petitioner

v.

APPLICATIONS IN INTERNET TIME LLC,  
Patent Owner.

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Case IPR2015-01750  
US Patent No. 8,484,111

Case IPR2015-01751  
Case IPR2015-01752  
Patent 7,356,482 B2<sup>1</sup>

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PATENT OWNER'S REQUESTS FOR PRODUCTION TO RPX CORP.

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<sup>1</sup> The word-for-word identical paper is filed in each proceeding identified in the heading.

Patent Owner Applications in Internet Time LLC (“AIT”) requests that Petitioner RPX Corporation (“RPX”) produce the following documents and things.

## **INSTRUCTIONS**

In responding to and producing documents and things responsive to these Requests, RPX must comply with the instructions in the Office Patent Trial Practice Guide.

1. If RPX is aware of any responsive documents but cannot produce them because they have been lost or destroyed or are no longer in RPX’s possession, custody, or control, RPX should identify those documents. Identify any responsive documents of which RPX is aware but cannot produce because they have been lost or destroyed or are no longer in Petitioner’s possession, custody, or control.

2. If RPX finds the meaning of any term in the Requests unclear, RPX should assume a reasonable meaning, state what the assumed meaning is, and produce documents and things on the basis of that assumed meaning.

Unless otherwise stated, the requests seek documents and things created from 2013 to the present.

## **DEFINITIONS**

1. “Document” has the broadest meaning accorded to it by FED. R. CIV. P. 34.
2. The term “Salesforce” means salesforce.com, inc.
3. The term “Related IPR Proceedings” means Case Nos. IPR2015-01750, IPR2015-01751 and IPR2015-01752.
4. The term “Challenged Patents” means the following patents which are the subject of the IPR proceedings: U.S. Patent Nos. 7,356,482 and 8,484,111.
5. The term “Salesforce Litigation” means the litigation styled *Applications in Internet Time LLC v. Salesforce.com, Inc.*, No. 3:13-cv-628-RCJ-VPC (D. Nev.).
6. The term “communications” means the transmission or receipt of information of any kind through any means (e.g. email, voicemail, audio, computer readable media, or orally).
7. The term *ParkerVision* means *Farmwald v ParkerVision, Inc.*, Case IPR2014-00946, Case IPR2014-00947 and Case IPR2014-00948 (February 20, 2015).

## **REQUESTS FOR PRODUCTION**

**Request No. 1:** Documents sufficient to show Salesforce’s relationship to RPX, such as membership or client agreements, and renewals.

**Request No. 2:** Documents sufficient to show RPX's annual billings to Salesforce and the services associated with those billings.

**Request No. 3:** Communications between RPX and Salesforce, and their respective attorneys and agents, relating to the Challenged Patents, the Related IPR Proceedings, or the Salesforce Litigation, whether by name, code name or euphemism.

**Request No. 4:** Documents sufficient to show the names, dates, locations and times of any meetings or communications between Salesforce and RPX, or their attorneys, after the Salesforce Litigation began, unless produced under a prior request herein.

**Request No. 5:** [Intentionally omitted]

**Request No. 6:** All documents showing why RPX decided to challenge the Challenged Patents, unless produced under a prior request herein.

**Request No. 7:** Documents, such as invoices, sufficient to show all funds or consideration provided to RPX with the purpose of funding the Related IPR Proceedings, including dates and source of funds, unless produced under a prior request herein.

**Request No. 8:** Documents sufficient to show how Sanford R. Robertson separates his fiduciary duties to RPX and Salesforce despite serving simultaneously as a Board Member of RPX and as a Board Member of Salesforce.

Date: 10/20/2015

Respectfully Submitted,

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*Attorneys for Applications In Internet  
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