

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX CORPORATION,
Petitioner

v.

APPLICATIONS IN INTERNET TIME LLC,
Patent Owner.

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

Case IPR2015-01751
Case IPR2015-01752
Patent 7,356,482 B2

PATENT OWNER'S REQUESTS FOR PRODUCTION TO RPX CORP.

RPX Exhibit 1115
RPX v. AIT

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 any agreement between RPX and Salesforce obligating RPX to pursue the Related IPR Proceedings.

Request No. 2: Communications between RPX and Salesforce, whether directly or through their respective attorneys and agents, relating to the Related IPR Proceedings, whether by name, code name or euphemism.

Request No. 3: 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.

Date:

Respectfully Submitted,

By:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this "PATENT OWNER'S REQUESTS FOR PRODUCTION TO RPX CORP." has been served via Express Mail on_____, upon the following:

Richard F. Giunta
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Dated:

By: