

Discovery Request:

Patent Owner requests that Petitioner, its expert Dr. Jose Tellado, and Petitioner's IPR counsel produce a copy of each unique version of Matlab simulation code and simulation results (including any full or partial results) for an 18,000 foot loop, including without limitation the simulation code and results that Dr. Tellado testified about during his cross-examination on June 20, 2017. *See* Ex. 2013 at 45:23–47:18.