

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICAN NATIONAL MANUFACTURING INC.,
Petitioner,

v.

SLEEP NUMBER CORPORATION
f/k/a SELECT COMFORT CORPORATION,
Patent Owner.

Case IPR2019-00497
Patent 8,769,747 B2

PATENT OWNER'S DISCOVERY REQUESTS

Sleep Number Corp.
EXHIBIT 2016
IPR2019-00497
Page 1

Patent Owner Sleep Number Corporation (“Sleep Number”) requests that Petitioner American National Manufacturing Inc. (“ANM” or “You”) produce the following information and documents within 14 days:

Definitions

1. “ANM’s Accused Source Code” shall mean the source code produced by ANM and identified by Sleep Number in its infringement contentions served on January 25, 2019 in *Sleep Number v. ANM*, 5:18-cv-00357AB(SP_x) and which includes Versions 1.8, 1.97, and 2.0.

2. “An Accused Source Code” shall include all of ANM’s Accused Source Code.

Interrogatories

Interrogatory No. 1: Please describe and identify sales on all *consumer* inflatable air bed systems sold by ANM under the Instant Comfort brand name (including but not limited to the model Q2, Q3, Q4, Q5, Q6, Q7, Q7-T, Q8, Q9, S6, S7, S7-T, S8 and S9 bed systems) from 2009 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold *with* ANM’s Accused Source Code, (2) an identification of

Deleted: and Real Party-in-Interest Sizewise Rentals, LLC (“Sizewise”)

Deleted: “Sizewise’s Accused Source Code” shall mean the source code produced by Sizewise and identified by Sleep Number in its infringement contentions served on January 25, 2019 in *Sleep Number v. Sizewise*, 5:18-cv- 00356AB(SP_x) and which includes the Platinum Source File source code.¶

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inflatable air beds sold *without* ANM's Accused Source Code, and (3) separately for the foregoing two categories, an identification of (by SKU or product name) **and** the number of units sold.

Interrogatory No. 2: Please describe and identify sales on all *medical* inflatable air bed systems sold by ANM (including but not limited to any bed models currently or previously listed on ANM's website, <http://www.americannationalmfg.com/medical-beds.html>) from 2009 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold *with* ANM's Accused Source Code, (2) an identification of inflatable air beds sold *without* ANM's Accused Source Code, and (3) separately for the foregoing two categories, an identification of (by SKU or product name) **and** the number of units sold.

Interrogatory No. 3: Please describe and identify sales on all *medical* inflatable air beds from 2009 to present sold or leased by ANM (including sales or leases by ANM to Sizewise) on a monthly or quarterly basis, including the following: the number of units sold/leased.

Interrogatory No. 4: For all sales identified in response to the Interrogatories above, please identify, on a monthly or quarterly basis, (1) which of the units

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sold/leased were to third-party retailers or distributors.

Interrogatory No. 5: Please identify each SKU or product sold or leased since 2009, and whether each SKU or product includes An Accused Source Code.

Requests For Production

Request No. 1: Please produce an excel spreadsheet that identifies sales on all consumer inflatable air bed systems sold by ANM under the Instant Comfort brand name (including but not limited to the model Q2, Q3, Q4, Q5, Q6, Q7, Q7-T, Q8, Q9, S6, S7, S7-T, S8 and S9 bed systems) from 2009 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold with ANM's Accused Source Code, (2) an identification of inflatable air beds sold without ANM's Accused Source Code, and (3) separately for the foregoing two categories, an identification of (by SKU or product name) and the number of units sold.

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Deleted: the differentiating product features, as between Your SKUs or products, for

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Deleted: , and whether each SKU or product includes, for example, dual adjustability, a mobile app or app capabilities, a cooling or heating element or technology (e.g., cooling memory foam), and/or other differentiating features

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Request No. 2: Please produce an excel spreadsheet that identifies sales on all *medical* inflatable air bed systems sold by ANM (including but not limited to any bed models currently or previously listed on ANM's website, <http://www.americannationalmfg.com/medical-beds.html>) from 2009 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold *with* ANM's Accused Source Code, (2) an identification of inflatable air beds sold *without* ANM's Accused Source Code, and (3) separately for the foregoing two categories, an identification of (by SKU or product name) and the number of units sold.

Request No. 3: Please produce an excel spreadsheet that identifies sales on all inflatable air beds sold or leased by ANM from 2009 to present on a monthly or quarterly basis, including the following: the number of units sold/leased.

Request No. 4: For all sales identified in the documents responsive to the Document Requests above, produce an excel spreadsheet that identifies, on a monthly or quarterly basis, (1) which of the units sold/leased were to third-party retailers or distributors.

Request No. 5: Please produce an excel spreadsheet that identifies for each SKU or product sold or leased since 2009, and whether each SKU or product includes An Accused Source Code.

Dated: October XX, 2019 By: /s/ _____

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