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 IPR2019-00500 Patent 9,737,154 B2

PATENT OWNER'S SECOND SET OF DISCOVERY REQUESTS



Sleep Number Corp.

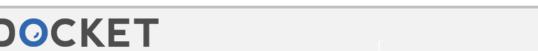
Patent Owner Sleep Number Corporation ("Sleep Number") requests that Petitioner American National Manufacturing Inc. ("ANM" or "You") provide the following within two business days:

Definitions

- 1. "Sleep Number's Infringement Contentions Against ANM" shall mean the three Exhibits attached to Plaintiff's Amended Disclosure of Asserted Claims and Infringement Contentions served by Sleep Number on January 25, 2019 in *Sleep Number v. ANM*, 5:18-cv-00357AB(SPx). It shall not include the three Exhibits attached to Plaintiff's Amended Disclosure of Asserted Claims and Infringement Contentions served by Sleep Number on January 25, 2019 in *Sleep Number v. Sizewise*, 5:18-cv-00356AB(SPx).
- 2. "Accused Source Code" shall mean the following five versions of ANM's source code provided for inspection by ANM, printed within bates stamped documents ANMISC_0001-0031, ANMISC_0038-0111, and ANMISC_0121-0437, and identified in Sleep Number's Infringement Contentions: Versions 1.8, 1.9, 1.92, 1.97, and 2.0.
- 3. "Access and Use" shall mean allowing the use of, including but not limited to as Exhibits for Papers submitted to the Board and for witness examinations, under the protections of the Stipulated Protective Order.

<u>Interrogatory</u>

Interrogatory No. 1: Please affirmatively provide notice that Sleep Number may Access and Use the Accused Source Code in this IPR Proceeding.



Find authenticated court documents without watermarks at docketalarm.com.

Document Request

Request No. 1: Please produce, or in the alternative provide Access and Use of, the following: (1) the Accused Source Code contained within bates numbered pages ANMISC_0001-0031, ANMISC_0038-0111, and ANMISC_0121-0437 and (2) Sleep Number's Infringement Contentions Against ANM.

Dated: October 23, 2019 By: /s/ Luke Toft

Luke Toft (Reg. No. 75,311)
Andrew Hansen (pro hac vice)
Archana Nath (pro hac vice)
Elizabeth A. Patton (pro hac vice)
FOX ROTHSCHILD LLP
222 South Ninth Street, Suite 2000
Minneapolis, MN 55402
Telephone: (612) 607-7000
ltoft@foxrothschild.com
ahansen@foxrothschild.com
epatton@foxrothschild.com

Steven A. Moore (Reg. No. 55,462)
PILLSBURY WINTHROP SHAW PITTMAN LLP
501 West Broadway, Suite 1100
San Diego, CA 92101
Telephone: (619) 234-5000
steve.moore@pillsburylaw.com



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Kecia J. Reynolds (Reg. No. 47,021)
PILLSBURY WINTHROP SHAW PITTMAN LLP
1200 Seventeenth Street, NW
Washington, DC 20036
Telephone: (202) 663-8000
kecia.reynolds@pillsburylaw.com

Attorneys for Patent Owner Sleep Number Corporation



Sleep Number Corp.

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned hereby certifies that on October 23, 2019, the foregoing Patent Owner's Second Discovery Requests was served via e-mail, as authorized by the Petitioner, at the following email correspondence address of record as follows:

Kyle L. Elliott kelliott@spencerfane.com Kevin S. Tuttle ktuttle@spencerfane.com Brian T. Bear bbear@spencerfane.com Lori J. Allee jallee@spencerfane.com SPENCER FANE LLP 1000 Walnut Street, Suite 1400 Kansas City, MO 64106

Jaspal S. Hare jhare@spencerfane.com SPENCER FANE LLP 2200 Ross Avenue Suite 4800 West Dallas, TX 75201

Dated: October 23, 2019 /s/ Luke Toft

Luke Toft (Reg. No. 75, 311) Counsel for Patent Owner



Sleep Number Corp.