

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 IPR2019-00514
Patent 5,904,172

PATENT OWNER'S SECOND SET OF DISCOVERY REQUESTS

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(SP_x). 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(SP_x).

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.

Interrogatory

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

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

anath@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

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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