

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AMERICAN NATIONAL MANUFACTURING INC.,  
Petitioner,

v.

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

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Case IPR2019-00514  
Patent 5,904,172

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**PATENT OWNER'S DISCOVERY REQUESTS**

Sleep Number Corp.  
EXHIBIT 2026  
IPR2019-00514  
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:

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

### Definitions

1. “ANM’s Accused Air Controllers” shall include those identified by Sleep Number in its infringement contentions served on January 25, 2019 in *Sleep Number v. ANM*, 5:18-cv-00357AB(SP<sub>x</sub>) and which includes the air controllers identified on ANMI00133418-133422.

2. “An Accused Air Controller” shall include all of ANM’s Accused Air Controllers.

**Deleted:** <#> “Sizewise’s Accused Air Controllers” shall include those identified by Sleep Number in its infringement contentions served on January 25, 2019 in *Sleep Number v. Sizewise*, 5:18-cv-00356AB(SP<sub>x</sub>) and which includes the Platinum 5000 air controller and the Platinum 6000 air controller.¶

### 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 1999 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold with ANM’s Accused Air Controllers, (2) an identification of inflatable air beds sold without ANM’s Accused Air Controllers, 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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**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

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currently or previously listed on ANM's website, <http://www.americannationalmfg.com/medical-beds.html>) from 1999 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold *with* ANM's Accused Air Controllers, (2) an identification of inflatable air beds sold *without* ANM's Accused Air Controllers, 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 2008 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 sold/leased were to third-party retailers or distributors.

**Interrogatory No. 5:** Please identify each SKU or product sold or leased since 1999, and whether each SKU or product includes An Accused Air Controller.

### 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 1999 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds

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**Deleted:** (1) an identification of inflatable air beds sold or leased *with* Sizewise's Accused Air Controllers, (2) an identification of inflatable air beds sold or leased *without* Sizewise's Accused Air Controllers, and (3) separately for the foregoing two categories, an identification of (by SKU or product name)

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**Deleted:** describe and

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sold *with* ANM's Accused Air Controllers, (2) an identification of inflatable air beds sold *without* ANM's Accused Air Controllers, and (3) separately for the foregoing two categories, an identification of (by SKU or product name) and the number of units sold.

**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 1999 to present on a monthly or quarterly basis, including the following: (1) an identification of inflatable air beds sold *with* ANM's Accused Air Controllers, (2) an identification of inflatable air beds sold *without* ANM's Accused Air Controllers, 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 2008 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.

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**Request No. 5:** Please produce an excel spreadsheet that identifies for each SKU or product sold or leased since 1999, and whether each SKU or product includes An Accused Air Controller.

Dated: October XX, 2019

By: /s/ \_\_\_\_\_

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

**Deleted:** including the size of the bed (e.g., King or Queen), the mattress height, the number and type of comfort or foam types included in the bed and the thickness of each, whether the remotes are wired or wireless,

**Deleted:** , and whether each SKU or product includes 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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