

ATTACHMENT A

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, and in accordance with the instructions and definitions listed below, MemoryWeb, LLC (“MemoryWeb”) requests that Kevin Jakel testify in his capacity as the CEO of Unified Patents, LLC at a deposition on the following topics.

DEFINITIONS

The following terms and phrases are to be given the definitions set forth below. Notwithstanding any of the definitions below, each word, term, or phrase used in this Schedule A is intended, and shall be construed, to have the broadest permissible meaning under the Federal Rules of Civil Procedure.

1. “Mr. Jakel” or “Jakel” refers to Kevin Jakel, CEO and Founder of Unified Patents, LLC.

2. “Unified,” “Unified Patents,” “You,” or “Your,” means Unified Patents, LLC and its respective past and present officers, directors, affiliates, brokers, agents, representatives, employees, servants, accountants, investment bankers, attorneys, and all other persons acting directly or indirectly under its control and including all affiliated companies or entities, including parents, subsidiaries, predecessors, successors, partners, and joint ventures.

3. “Samsung” means Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. and their respective past and present officers, directors,

affiliates, brokers, agents, representatives, employees, servants, accountants, investment bankers, attorneys, and all other persons acting directly or indirectly under its control and including all affiliated companies or entities, including parents, subsidiaries, predecessors, successors, partners, and joint ventures.

4. “MemoryWeb” or “Patent Owner” means MemoryWeb, LLC, and its respective past and present officers, directors, affiliates, brokers, agents, representatives, employees, servants, accountants, investment bankers, attorneys, and all other persons acting directly or indirectly under its control and including all affiliated companies or entities, including parents, subsidiaries, predecessors, successors, partners, and joint ventures.

5. “IPR2021-01413” or “Unified IPR” refers to the *inter partes* review proceeding captioned as *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413 before the Patent Trial and Appeal Board.

6. “The ’228 Patent” or “Challenged Patent” refers to U.S. Patent No. 10,621,228.

7. “IPR2022-00031” or “Apple IPR” refer to the *inter partes* review proceeding captioned as *Apple Inc. v. MemoryWeb, LLC*, IPR2022-00031 before the Patent Trial and Appeal Board.

8. “IPR2022-00222” or “Samsung IPR” refer to the *inter partes* review proceeding captioned as *Samsung Electronics Co., Ltd. v. MemoryWeb, LLC*, IPR2022-00222 before the Patent Trial and Appeal Board.

9. The terms “Document” and “Documents” shall have the broadest possible meaning allowed by the Federal Rules of Civil Procedure and including (without limitation) any writing of any kind, including originals and all non-identical copies (whether different from the original by reason of any notation made on such copies or otherwise). The terms “document” and “document(s)” shall also include, without limitation, the following items, whether printed or reproduced by any process, or written or produced by hand or stored in computer memory, magnetic or hard disk or other data storage medium, and whether or not claimed to be privileged, confidential or otherwise excludable from discovery, namely, notes, letters, correspondence, communications, e-mails, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or meetings, diaries, reports, laboratory and research reports and notebooks, recorded experiments, charts, plans, drawings, diagrams, schematic diagrams, illustrations, product descriptions, product analyses, requests for proposals, documents related to proposed or actual produce improvements or changes, users manuals or guides, installation guides or manuals, technical descriptions or specifications, product repair manuals or guides, photographs, video images,

software flow charts or descriptions or specifications, minutes or records of meetings, summaries of interviews, reports, or investigations, opinions or reports of consultants, reports of patent searches, patent appraisals, opinions of counsel, agreements, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of documents, and all other materials fixed in a tangible medium of whatever kind known to You or in Your possession, custody or control.

10. The term “Communication” shall mean the transmittal of information, in the form of facts, ideas, inquiries, or otherwise.

11. The term “Thing” or “Things” shall have the broadest possible meaning allowed by the Federal Rules of Civil Procedure and refers to all tangible objects and items other than Documents and includes every such object and item regardless of nature or kind such as, by way of example but without limitation, machines, devices, components, parts, assemblies, models, samples, prototypes, and commercial and production items, whether or not complete and whether or not functional.

12. The terms “and” and “or” shall be construed either disjunctively or conjunctively, as necessary to bring within the scope of the discovery request all responses that might otherwise be outside of its scope.

DEPOSITION TOPICS

1. The subject matter in Mr. Jakel's September 2, 2021 declaration, which was submitted by Unified as Exhibit 1017 in IPR2021-01413.
2. The subject matter in Mr. Jakel's December 30, 2021 supplemental declaration, which was submitted by Unified as Exhibit 1023 in IPR2021-01413 and was designated as "Highly Confidential – Attorneys' Eyes Only" and sealed under the Unified IPR Protective Order.
3. The testimony during Mr. Jakel's May 26, 2022 deposition in IPR2021-01413, the transcript of which was submitted by MemoryWeb as Exhibit 2036 in IPR2021-01413 and which was designated as "Highly Confidential – Attorneys' Eyes Only" and sealed under the Unified IPR Protective Order.
4. The contents and authentication of all Documents produced by Unified pursuant to MemoryWeb's document subpoena and/or were submitted into evidence during the Unified IPR.

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