

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

MEMORYWEB, LLC

Patent Owner

Patent No. 10,621,228

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*Inter Partes* Review No. IPR2022-00222

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**PATENT OWNER'S REQUESTS FOR PRODUCTION**

## I. INSTRUCTIONS

1. In producing documents or other information responsive to these Requests for Production (“RFPs”), Petitioner is to comply with the Federal Rules of Civil Procedure 26 and 34, the Board’s Scheduling Order, and any other Board Order in this proceeding, and the instructions in the Patent Trial and Appeal Board Practice Guide.

2. For each Request, identify any responsive document that Petitioner is aware of but cannot produce because it has been lost or destroyed or is no longer in Petitioner’s possession, custody, or control.

3. If Petitioner believes the meaning of any term in any Request is unclear, Petitioner should assume a reasonable meaning, state what the assumed meaning is, and produce documents and things or provide information on the basis of that assumed meaning.

4. For any document responsive to a Request that Petitioner withholds on the basis of privilege, Petitioner shall provide a privilege log identifying the document’s date, author(s), recipient(s), subject matter, and the basis of the asserted privilege.

## II. DEFINITIONS

5. “Samsung” or “Petitioner” means Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. and all their current and former parents,

subsidiaries, affiliates, predecessors, successors, employees, managers, officers, directors, partners, agents, representatives, attorneys, or anyone acting or purporting to act on its behalf or control.

6. “MemoryWeb” or “Patent Owner” means MemoryWeb, LLC and all its current and former parents, subsidiaries, affiliates, predecessors, successors, employees, managers, officers, directors, partners, agents, representatives, attorneys, or anyone acting or purporting to act on its behalf or control.

7. “Unified” means Unified Patents, LLC and all its current and former parents, subsidiaries, affiliates, predecessors, successors, employees, managers, officers, directors, partners, agents, representatives, attorneys, or anyone acting or purporting to act on its behalf or control.

8. “Samsung IPR” means the *inter partes* review proceeding captioned as *Samsung Electronics Co., Ltd. v. MemoryWeb, LLC*, IPR2022-00222.

9. “Unified IPR” means the *inter partes* review proceeding captioned as *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413.

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

### III. REQUESTS

1. All Communications with Unified, or about Unified, relating to MemoryWeb, the ‘228 Patent, the Unified IPR, or the Samsung IPR.

2. All agreements or contracts between Samsung and Unified, including Samsung's membership agreement and any amendments, attachments, or add-ons thereto.

Dated: June 30, 2023

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