

IPR2024-00283  
Patent 6,993,658

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AMAZON.COM, INC.

Petitioners,

v.

DYNAPASS IP HOLDINGS LLC

Patent Owner

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*Inter Partes* Review No. IPR2024-00283

Patent No. 6,993,658

**DYNAPASS IP HOLDINGS LLC'S  
DISCOVERY REQUESTS TO PETITIONER**

Patent Owner Dynapass IP Holdings LLC (“Patent Owner”) requests that Petitioner Amazon.com, Inc. (“Petitioner”) respond to the following Interrogatories.

### **Instructions**

1. Petitioner must answer each Interrogatory fully, in writing, and under oath. Fed. R. Civ. P. 33(b)(3).

2. If Petitioner claims that the attorney-client privilege or any other privilege or protection is applicable to any of the information requested by an Interrogatory, Petitioner shall set forth separately: (a) the type of information withheld; (b) a detailed description of the subject matter of the information; (c) the name, address, and job title of each person who received or conveyed this information; and (d) a statement of the basis upon which the claim of privilege or protection is made.

3. Petitioner has an ongoing obligation to timely supplement its response if Petitioner learns that its response is incomplete or incorrect. Fed. R. Civ. P. 26(e)(1).

### **Discovery Requests**

Interrogatory No. 1: Identify whether Petitioner has ever been a direct or indirect member of Unified Patents, LLC.

Interrogatory No. 2: To the extent Petitioner has ever been a direct or indirect member of Unified Patents, LLC, identify the date(s) when Petitioner was a direct or indirect member of Unified Patents, LLC.

Dated March 29, 2024

Respectfully submitted,

By: /John Wittenzellner/  
John Wittenzellner  
USPTO Registration No. 61,662  
Counsel for Patent Owner  
Dynapass IP Holdings LLC