IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

KONINKLIJKE KPN N.V., Plaintiff, v. TELEFONAKTIEBOLAGET LM ERICSSON and ERICSSON INC., Defendants.	C.A. No. 2:22-cv-282-JRG **JURY TRIAL DEMANDED**

PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiff Koninklijke KPN N.V. ("KPN" or "Plaintiff") hereby requests that Defendants Telefonaktiebolaget LM Ericsson and Ericsson Inc.'s (together, "Ericsson") answer the following requests for admission separately, fully, and under oath within thirty (30) days of service and in the manner required by the Federal Rules of Civil Procedure.

DEFINITIONS

1. The term "Asserted Patents" or "Patents in Suit" shall mean all patents asserted in the pending litigation between KPN and Ericsson, including but not limited to U.S. Patent No. 7,092,705 B2; U.S. Patent No. 8,660,560 B2; U.S. Patent No. 8,886,772 B2; U.S. Patent No. 9,372,098 B2; and U.S. Patent No. 10,924,500 B2.

2. The term "ESSENTIAL" has the meaning provided in Clause 15 of the European Telecommunications Standards Institute's Intellectual Property Rights Policy.

INSTRUCTIONS

1. Each request shall be construed independently and not with reference to any other request for purposes of limitation unless the request so specifies.

KONINKLIJKE KPN N.V.
EXHIBIT 2013

2. Answer each request separately and as completely as possible. If a request cannot be answered completely, please answer it to the greatest extent possible.

3. Pursuant to Federal Rule of Civil Procedure 36(a)(4), if you respond that you cannot admit or deny a request, your answer should include the specific reasons why you cannot admit or deny the matter.

4. If you cannot deny the entirety of any particular request, specify which component of the request you are denying, and admit the remainder of the request.

5. If You object to responding to a request on the basis of a claimed privilege, then with respect to each such request:

(a) State with specificity the reason or reasons for your objection and/or the nature of any privilege asserted;

(b) State the name and address of each person having knowledge of the factual basis, if any, upon which the privilege or other objection is asserted; and

(c) Identify any document, communication, or other item to which you claim supports your assertion of privilege, with sufficient specificity to permit a determination of the propriety of such claim.

(d) Answer the request to the extent it calls for information with respect to which you do not claim a privilege.

6. These requests are continuing in nature and require prompt supplementation of Your responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that Claim 1 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 2: Admit that Claim 1 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 3: Admit that Claim 2 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 4: Admit that Claim 2 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 5: Admit that Claim 3 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 6: Admit that Claim 3 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 7: Admit that Claim 4 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 8: Admit that Claim 4 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 9: Admit that Claim 5 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 10: Admit that Claim 5 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 11: Admit that Claim 6 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 12: Admit that Claim 6 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 13: Admit that Claim 22 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 14: Admit that Claim 22 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 15: Admit that Claim 23 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 16: Admit that Claim 23 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 17: Admit that Claim 24 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 18: Admit that Claim 24 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 19: Admit that Claim 25 of U.S. Patent No. 7,092,705 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 20: Admit that Claim 25 of U.S. Patent No. 7,092,705 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 21: Admit that Claim 1 of U.S. Patent No. 8,660,560 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 22: Admit that Claim 1 of U.S. Patent No. 8,660,560 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 23: Admit that Claim 6 of U.S. Patent No. 8,660,560 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 24: Admit that Claim 6 of U.S. Patent No. 8,660,560 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 25: Admit that Claim 7 of U.S. Patent No. 8,660,560 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 26: Admit that Claim 7 of U.S. Patent No. 8,660,560 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 27: Admit that Claim 8 of U.S. Patent No. 8,660,560 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 28: Admit that Claim 8 of U.S. Patent No. 8,660,560 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 29: Admit that Claim 1 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 30: Admit that Claim 1 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 31: Admit that Claim 2 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 32: Admit that Claim 2 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 33: Admit that Claim 3 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 34: Admit that Claim 3 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 35: Admit that Claim 4 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 36: Admit that Claim 4 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 37: Admit that Claim 5 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 38: Admit that Claim 5 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 39: Admit that Claim 6 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 40: Admit that Claim 6 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 41: Admit that Claim 10 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 42: Admit that Claim 10 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 43: Admit that Claim 11 of U.S. Patent No. 8,886,772 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 44: Admit that Claim 11 of U.S. Patent No. 8,886,772 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 45: Admit that Claim 17 of U.S. Patent No. 9,372,098 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 46: Admit that Claim 17 of U.S. Patent No. 9,372,098 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 47: Admit that Claim 20 of U.S. Patent No. 9,372,098 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 48: Admit that Claim 20 of U.S. Patent No. 9,372,098 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 49: Admit that Claim 1 of U.S. Patent No. 10,924,500 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 50: Admit that Claim 1 of U.S. Patent No. 10,924,500 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 51: Admit that Claim 5 of U.S. Patent No. 10,924,500 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 52: Admit that Claim 5 of U.S. Patent No. 10,924,500 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 53: Admit that Claim 7 of U.S. Patent No. 10,924,500 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 54: Admit that Claim 7 of U.S. Patent No. 10,924,500 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 55: Admit that Claim 9 of U.S. Patent No. 10,924,500 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 56: Admit that Claim 9 of U.S. Patent No. 10,924,500 B2 is not ESSENTIAL.

REQUEST FOR ADMISSION NO. 57: Admit that Claim 10 of U.S. Patent No. 10,924,500 B2 is ESSENTIAL.

REQUEST FOR ADMISSION NO. 58: Admit that Claim 10 of U.S. Patent No. 10,924,500 B2 is not ESSENTIAL.

Date: January 19, 2023

Respectfully submitted,

/s/ Savannah Ezelle
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. E.D. TEX. LOCAL RULE CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on January 19, 2023.

/s/ Savannah Ezelle