

UNITED STATES PATENT AND TRADEMARK
OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUASAR SCIENCE LLC

Petitioner,

v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT LED

Patent Owner.

Case: IPR2023-00611
U.S. Patent No. 10,197,224

**PATENT OWNER COLT'S
INTERROGATORIES**

PATENT OWNER COLT'S INTERROGATORIES

Patent Owner Colt International Clothing, Inc. respectfully requests that the following interrogatories be answered by Petitioner within 14 days by email to Patent Owner's counsel.

DEFINITIONS

These definitions are for purposes of these interrogatories only.

"Petitioner Quasar" means and includes Petitioner Quasar Science LLC (a Delaware limited liability company) and the entities Petitioner identified pursuant to 37 C.F.R. §42.8(b)(1) as real parties-in-interest in the above-captioned proceeding, namely: Videndum Production Solutions, Inc., Videndum US Holdings Inc., Videndum Holdings, Ltd., Videndum Investments Limited, Videndum Group Holdings, Ltd and Videndum plc.

"Videndum Entities" means the real parties-in-interest of Petitioner Quasar Science LLC, namely: Videndum Production Solutions, Inc., Videndum US Holdings Inc., Videndum Holdings, Ltd., Videndum Investments Limited, Videndum Group Holdings, Ltd and Videndum plc.

"Old Quasar" means the company that was named Quasar Science LLC (a California limited liability company) which **Petitioner Quasar**¹ acquired and/or

¹ **Petitioner Quasar** includes, as defined above herein, the **Videndum Entities**.

purchased assets of in a transaction that closed in or about 2021.

“Rentals” means transactions where a customer rents or leases product(s).

“Sales” means transactions where a customer buys product(s).

“Multicolored LED Tube Lights” means all LED luminaires made in a tube form factor, marketed and/or sold for film and/or television recording, having at least four different colors of LEDs.

“Petitioner Quasar’s Rainbow Lights” means and includes **Petitioner Quasar’s** products having model names “Rainbow” and/or “Rainbow 2” and/or having the model numbers Q25R, Q50R, Q100R, Q25R2, Q50R2 and/or Q100R2.

“Old Quasar’s Rainbow Lights” means and includes **Old Quasar’s** products having model names “Rainbow” and/or “Rainbow 2” and/or having the model numbers Q25R, Q50R, Q100R, Q25R2, Q50R2 and/or Q100R2.

INSTRUCTIONS

1. To the extent the information requested in any of the below Interrogatory Nos. 1, 2, 4 and/or 5 may be provided in spreadsheet form, Petitioner may respond by providing such a spreadsheet.

2. If **Petitioner Quasar** does not have sufficiently specific data to respond to Interrogatories Nos. 4 to 6 for each year and/or for each product, **Petitioner Quasar** should provide responses to the extent available and respond to any of the remainder

of the interrogatory based on best data, calculations and/or estimates that **Petitioner Quasar** received, made or has made, when **Petitioner Quasar** acquired and/or purchased assets of **Old Quasar** even if such data, calculations and/or estimates were not broken down on a product-by-product basis and thus may cover multiple model numbers.

INTERROGATORIES

Interrogatory No. 1: For each of the years 2021, 2022 and 2023 (year to date) please state **Petitioner Quasar's** annual revenues from sales of **Petitioner Quasar's Rainbow Lights**.

Interrogatory No. 2: For each of the years 2021, 2022 and 2023 (year to date) please state **Petitioner Quasar's** annual revenues from rentals of **Petitioner Quasar's Rainbow Lights**.

Interrogatory No. 3: Please state any overall share or percentage of the market for **Multicolored LED Tube Lights** (based on revenue) for **Petitioner Quasar's Rainbow Lights** as estimated or determined by **Petitioner Quasar** for each of the years 2021, 2022 and 2023.

Interrogatory No. 4: For each of the years 2017 to 2021, please state **Old Quasar's** annual revenues from sales of **Petitioner Quasar's Rainbow Lights**.

Interrogatory No. 5: For each of the years 2017 to 2021 please state **Old Quasar's** annual revenues of rentals of **Petitioner Quasar's Rainbow Lights**.

Interrogatory No. 6: Please state any overall share or percentage of the market for **Multicolored LED Tube Lights** (based on revenue) for **Petitioner Quasar's Rainbow Lights**, which overall share or percentage of the market is as estimated or determined by **Petitioner Quasar** and/or **Old Quasar** for each of the years 2017 to 2021.

Dated: _____, 2023

By: _____

David L. Hoffman, Lead Counsel

Reg. No. 32,469

David L. Hoffman

(Reg. No. 32,469)

dhoffman@nolanheimann.com

Nolan Heimann LLP

16000 Ventura Blvd., Suite 1200

Encino, CA 91436

Direct 818-946-1158

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER COLT'S INTERROGATORIES** was served on _____, 2023, via email directed to counsel of record for Petitioner at the following:

David M. Magee at dmagee@atllp.com
Armstrong Teasdale LLP
800 Boylston St., 30th Floor
Boston, MA 02199

Marc Vander Tuig at mvandertuig@atllp.com
And
Kyle G. Gottuso at kgottuso@atllp.com
Armstrong Teasdale LLP
7700 Forsyth Blvd., Suite 1800 St. Louis, MO 63105

Dated: _____, 2023

By: _____
David L. Hoffman, Esq.
Lead Counsel for Patent Owner
Reg. No. 32,469

David L. Hoffman
(Reg. No. 32,469)
dhoffman@nolanheimann.com

Nolan Heimann LLP
16000 Ventura Blvd., Suite 1200
Encino, CA 91436

Direct 818-946-1158