From: Kyle G. Gottuso
Sent: Tuesday, November 28, 2023 4:09 PM
To: David Hoffman; David M. Magee
Cc: ediederiks@dwpatentlaw.com; Marc Vander Tuig; nwhitelaw@dwpatentlaw.com; Sydney K. Johnson; Karl T. Fisher
Subject: RE: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) [IWOV-IDOCS.FID4631784]

David,

Noted regarding ROG No. 6.

We will take a look at the Default Protective Order.

Thanks.

Armstrong Teasdale LLP
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From: David Hoffman <dhoffman@nolanheimann.com>
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Subject: RE: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) [IWOV-IDOCS.FID4631784]

Hi Kyle,

After review, I'm willing to drop interrogatory no. 6 but not 4 and 5.

Regarding the protective order, I would suggest the Board's standard order. ("Default Protective Order" on pp. 117-122 of the Patent Trial and Appeal Board Consolidated Trial Practice Guide, November 2019)

David

David L. Hoffman | Partner
NOLAN HEIMANN LLP

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From: Kyle G. Gottuso <KGottuso@atllp.com>
Sent: Tuesday, November 28, 2023 1:43 PM
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Cc: ediederiks@dwpatentlaw.com; Marc Vander Tuig <MVanderTuig@atllp.com>; nwhitelaw@dwpatentlaw.com; Sydney K. Johnson <SKJohnson@atllp.com>; Karl T. Fisher <KFisher@atllp.com>
Subject: RE: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) [IWOV-IDOCS.FID4631784]

David,

We have considered your position but continue to disagree with the additional discovery, at least with respect to Interrogatories 4, 5, and 6. We will be filing oppositions to Patent Owner's Motions.

One additional item that we failed to discuss yesterday, but was discussed during the meet-and-confer with the Board is the need for a Protective Order in the event this discovery is ordered and before Petitioner responds to any Interrogatories. During the call with the Board, you agreed that a Protective Order could be put in place. Do you have specific protective order language in mind for this proceeding? If so, can you please share that with us so we can consider?

Thanks.

Armstrong Teasdale LLP
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From: David Hoffman <dhoffman@nolanheimann.com>
Sent: Tuesday, November 28, 2023 12:07 PM
To: Kyle G. Gottuso <KGottuso@atllp.com>; David M. Magee <DMagee@atllp.com>
Cc: ediederiks@dwpatentlaw.com; Marc Vander Tuig <MVanderTuig@atllp.com>; nwhitelaw@dwpatentlaw.com;

Sydney K. Johnson <SKJohnson@atllp.com>; Karl T. Fisher <KFisher@atllp.com>
Subject: RE: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) [IWOV-IDOCS.FID4631784]

Hi Kyle,
Thank you for the summary. What you stated is accurate except that I would add: Counsel for Patent Owner (me) also pointed out that Petitioner's press release of April 2021 and its annual report provided gross revenue numbers for 2019, 2020 and 2021 (partial year) for "Old Quasar," the company acquired by Vitec Group/Videndum, Petitioner's real party in interest. Accordingly, it is likely that Vitec Group/Videndum, a company that has operated in the same space as Old Quasar, and has acquired companies in the past, received a more detailed product or product category breakdown from Old Quasar, at least for the years 2019 and 2020.

I add (now) that Vitec Group/Videndum, a publicly traded company, thought the numbers it received from Old Quasar were reliable enough to put them in a press release and a report to shareholders. So I don't see how these numbers would be considered unreliable otherwise there would have been some kind of disclaimer in the press release and/or annual report. I'm hopeful that you'll reconsider and provide the numbers at least for 2019, 2020 and 2021 (to acquisition) for interrogatories 4 and 5 so we save the Board some time.

Thank you.
Sincerely,
David

David L. Hoffman | Partner
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From: Kyle G. Gottuso <KGottuso@atllp.com>
Sent: Tuesday, November 28, 2023 5:50 AM

To: David Hoffman <dhoffman@nolanheimann.com>; David M. Magee <DMagee@atllp.com>
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Subject: RE: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) [IWOV-IDOCS.FID4631784]

David,

Thank you for meeting with us yesterday to discuss Patent Owner's pending Motions for Additional Discovery. As we discussed, Petitioner disputes the relevancy of the discovery sought by Patent Owner, and objects as to the lack of relevancy, among other objections. But, in the interests of cooperation and to reduce the number of disputes in these IPR proceedings, Petitioner is willing to not oppose Patent Owner's request for discovery with respect to Interrogatories 1, 2, and 3 as identified in Exhibit 2008 (IPR2023-00611), Exhibit 2022 (IPR2023-00613), and Exhibit 2025 (IPR2023-00614). As you indicated during our meet-and-confer yesterday, however, Patent Owner agrees that Interrogatory No. 1 in IPR2023-00614 is not seeking "(i) annual quantities sold" or "(iii) gross margins for sales," but is instead only seeking revenue information like Interrogatories 1 and 2 in IPR2023-00611 and IPR2023-00613. We will proceed with this understanding. Also, as we stated on our phone call yesterday, Petitioner does not have information responsive to Interrogatory No. 3 (in each proceeding), and will indicate such in response to these Interrogatory.

As for Interrogatory Nos. 4, 5, and 6, Petitioner continues to oppose these discovery requests based on the fact that they are seeking information from "Old Quasar" and not Petitioner, for years that Petitioner did not sell the products identified in the Interrogatories. Additionally, like Interrogatory No. 3, Petitioner does not have information responsive to Interrogatory No. 6.

Please let us know if this accurately summarizes our meet-and-confer.

Thank you.

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From: David Hoffman <dhoffman@nolanheimann.com>
Sent: Saturday, November 18, 2023 3:52 AM
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Subject: Re: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED)

CAUTION: EXTERNAL EMAIL

Hi David, Kyle & Marc,

Here is patent owner's motion for additional discovery filed today and the exhibits 2008 to 2015 in the subject IPR. Remaining exhibits 2016 to 2020 will be emailed following this email.
Sincerely,

David L. Hoffman | Partner
NOLAN HEIMANN LLP

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Subject: IPR2023-00611: Document(s) Filed - Quasar Science LLC v. COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED)

UNITED STATES PATENT AND TRADEMARK OFFICE
PATENT TRIAL AND APPEAL BOARD
Document Filing Notice

AIA Review No.: IPR2023-00611
Petitioner: Quasar Science LLC of , CA
Patent Owner: COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) of Valencia, CA
Patent No.: 10197224
Submitted Date: 11/18/2023
Submitted By: DAVID HOFFMAN, dhoffman@nolanheimann.com
The following document(s) has/have been filed.
Document(s) List

No.	Document No.	Document Type	Document Name	Filing Party	Availability
1	18	Motion: Other	Patent Owner Motion for Additional Discovery	Patent owner	Available for everyone.
2	2008	Exhibit	Patent Owner Colt?s Interrogatories	Patent owner	Available for everyone.
3	2009	Exhibit	Declaration of David L. Hoffman	Patent owner	Available for everyone.
4	2010	Exhibit	Complaint filed February 17, 2022 against Petitioner Quasar Science LLC	Patent owner	Available for everyone.
5	2011	Exhibit	First Amended Complaint filed June 1, 2022 in Case No. 1:22-cv-00213	Patent owner	Available for everyone.
6	2012	Exhibit	Docket sheet for Case No. 1:22-cv-00213	Patent owner	Available for everyone.
7	2013	Exhibit	Protective Order in Case No. 1:22-cv-00213	Patent owner	Available for everyone.
8	2014	Exhibit	Colt's Initial Infringement Contentions	Patent owner	Available for everyone.
9	2015	Exhibit	Declaration of Zhang, Yu Jan	Patent owner	Available for everyone.
10	2016	Exhibit	Marketing Material from Petitioner Quasar?s website re Rainbow Light	Patent owner	Available for everyone.
11	2017	Exhibit	Marketing Material from Petitioner Quasar?s online marketing re Rainbow Light Products	Patent owner	Available for everyone.
12	2018	Exhibit	Marketing Material from RSTvisions.com re Rainbow Lights	Patent owner	Available for everyone.
13	2019	Exhibit	The Vitec Group plc Acquisitions and Trading Update dated April 12, 2019	Patent owner	Available for everyone.
14	2020	Exhibit	Vitec Group PLC entitled ?The Vitec Group plc 2021 Full Year Results? dated March 1, 2022	Patent owner	Available for everyone.

Questions regarding this receipt should be directed to the Patent Trial and Appeal Board at 571-272-7822 or e-mail to Trials@uspto.gov.
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