

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMMSCOPE TECHNOLOGIES LLC.
Petitioner

v.

BELDEN INC.
Patent Owner

Case: IPR2023-01061
U.S. Patent No. 6,998,537

PETITIONER'S REQUESTS FOR PRODUCTION

I. INSTRUCTIONS

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

2. If Patent Owner believes the meaning of any term in any Request is unclear, Patent Owner 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.

3. For any document responsive to a Request that Patent Owner withholds on the basis of privilege, Patent Owner 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

4. "Belden" means Belden Inc., Belden CDT (Canada) Inc., Belden Technologies, 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 their behalf.

5. The "Superior Essex Litigation" refers to *Belden Technologies Inc. v. Superior Essex Inc.*, Civil Action No. 1-08-cv-00063 (D. Del.).

6. The “’095 Patent” refers to U.S. Patent No. 6,570,095.
7. The “’537 Patent” refers to U.S. Patent No. 6,998,537.
8. The “’999 Patent” refers to U.S. Patent No. 7,179,999.
9. “GmbH-886” refers to German Utility Model Patent No. DE 297 19 866 U1 and any translations of it.
10. “Roberts” refers to U.S. Patent No. 3,622,683.
11. “Yanagida” refers to Japanese Patent Application Publication S43-15470 and any translations of it.

III. REQUESTS¹

1. Any expert reports or declarations submitted by or on behalf of Belden in the Superior Essex Litigation regarding the validity of the ’095 Patent, ’537 Patent, and ’999 Patent.
2. Deposition transcripts from the depositions of Belden’s expert and fact witnesses in the Superior Essex Litigation where GmbH-866 was addressed.
3. Belden’s discovery responses from the Superior Essex Litigation pertaining to the validity of the ’095 Patent, ’537 Patent, and ’999 Patent, specifically those discussing GmbH-866.

¹ To the extent a requested document contains confidential information of Superior Essex or any non-party to the Superior Essex Litigation, such confidential information may be redacted. To the extent a requested document contains confidential information of Belden in any sections regarding objective evidence of nonobviousness, such confidential information may be redacted.

4. Exhibit 41 to Docket Identification No. 125 from the Superior Essex Litigation.

5. Exhibit 34 to Docket Identification No. 125 from the Superior Essex Litigation.

6. JTX-397 from the Superior Essex Litigation.

7. Any other relevant information from the Superior Essex Litigation where Belden took a position that is inconsistent with a position it is advancing in this IPR (including any documents reflecting positions regarding what the GmbH-866, Roberts, or Yanagida references disclose that is inconsistent with a position Belden is taking regarding any one of those references in this IPR).