Filed: May 8, 2024

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLUME DISTRIBUTORS, INC.,
Petitioner,

v.

SIMPLEHUMAN LLC
Patent Owner.

IPR2024-00050
U.S. Patent No. 10,683,165

JOINT STIPULATION ON DISCOVERY

Pursuant to 37 C.F.R. § 42.51(b)(2), Patent Owner simplehuman LLC ("simplehuman") and Petitioner Volume Distributors, Inc. ("Volume Distributors") (collectively, the "Parties") hereby agree to the following additional discovery:

Both Parties agree to produce all underlying data, testing, and simulations relied upon by their experts in forming opinions set forth in an expert declaration. This does not require the parties to produce drafts of expert declarations, privileged discussions with counsel, or other discovery protected by Fed. R. Civ. P. 26(b).

Under this agreement, Volume Distributors will produce the CAD models referenced by Professor Visser in ¶¶ 112-116, 138-139 of his declaration (Ex. 1003) within 1 week of filing this agreement.

If either party later files an expert declaration in this IPR proceeding, that party will produce the underlying data, testing, and simulations relied upon by their expert in forming opinions in that expert declaration within 1 week of filing the expert declaration.

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Dated: May 8, 2024

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Dated: May 8, 2024

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **JOINT STIPULATION ON DISCOVERY** is being served on May 8, 2024, via electronic mail pursuant to 37 C.F.R. § 42.6(e) and with the agreement of counsel for Petitioner as address below:

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