

From: [Nightingale, Joshua R.](#)
To: [Oliver, Justin J.](#); [Devitt, William E.](#); [Khatri, Vishal V.](#); [Messing, Jeffrey S.](#)
Cc: [Dorsky, Jason M.](#); [Yam, Stephen K.](#); [Carlin, John D.](#)
Subject: RE: IPR2024-00101 - Luminex v. Signify
Date: Tuesday, October 29, 2024 9:00:40 AM

Caution: External Email

Justin,

Luminex opposes Signify's request for additional discovery. Please send us your email to the Board requesting a teleconference, and we will insert our position and dates of availability for the teleconference.

Regards,

Josh

Joshua R. Nightingale
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From: Oliver, Justin J. <JOliver@Venable.com>
Sent: Thursday, October 24, 2024 2:30 PM
To: Nightingale, Joshua R. <jrnightingale@jonesday.com>; Devitt, William E. <wdevitt@jonesday.com>; Khatri, Vishal V. <vkhatr@jonesday.com>; Messing, Jeffrey S. <jmessing@jonesday.com>
Cc: Dorsky, Jason M. <JMDorsky@Venable.com>; Yam, Stephen K. <SYam@Venable.com>; Carlin, John D. <JCarlin@Venable.com>
Subject: IPR2024-00101 - Luminex v. Signify

Counsel,

Signify intends to seek authorization from the Board to file a motion for additional discovery pertaining to whether Menard qualifies as an RPI. Please let us know (i) whether Luminex will oppose the request and (ii) times that you are available for a conference call with the Board on the matter during the period of October 29 through November 1.

To assist in your consideration of this matter, provided below are the likely discovery requests to be included in the motion. If Luminex is willing to produce any of the requested documents without an order from the Board, please let us know.

Regards,

Luminex v. Signify
IPR2024-00101
Exhibit 2021

Justin Oliver
Counsel for Patent Owner

1. All Communications (from February 8, 2021, through October 27, 2022) between Luminex and Menard relating to Signify's patent infringement allegations and/or offers to license (including without limitation MEN008627-30, MEN008675-78, and MEN008684-88).
2. All common interest agreements between Luminex and Menard prior to Luminex joining the Menard lawsuit and that pertain to Signify's patent infringement allegations and/or offers to license.
3. All Agreements between Luminex and Menard concerning any indemnification or defense obligation owed by Luminex pertaining to the accused products in the Menard lawsuit (including without limitation MEN005345-53 and MEN005891-98).
4. All Communications (from February 8, 2021, through October 25, 2023) between Luminex and Menard relating to the IPR Petition.
5. All documents and Communications between Luminex and Menard (from February 8, 2021, through October 25, 2023) relating to the prior art applied in the IPR Petition.
6. All documents and Communications relating to any contributions (through monetary payment or other form of compensation) by Menard to the costs in preparing and filing the IPR Petition (including costs associated with identifying prior art and/or compensating Dr. J. Gary Eden).

Justin J. Oliver, Esq. | [Venable LLP](#)
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