

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN PINCAN TECHNOLOGY CO., LTD,
Petitioner

v.

THE RIDGE WALLET LLC
Patent Owner

Case IPR2024-00340
Patent 10,791,808

PATENT OWNER'S ADDITIONAL DISCOVERY REQUESTS

1. Patent Owner The Ridge Wallet LLC (“Patent Owner”) requests that Petitioner, Shenzhen Pincan Technology Co., Ltd. (“Petitioner”) produce the following documents or information and respond to the following document requests and special interrogatories.

I. INSTRUCTIONS

2. In producing documents or other information responsive to these requests, Petitioner is to comply with the Federal Rules of Civil Procedure 26 and 34, the Board’s Scheduling Order, and any other Board Order in this proceeding, and the instructions in the Patent Trial and Appeal Board Practice Guide.

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

4. If Petitioner believes the meaning of any term in any Request is unclear, Petitioner 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.

5. For any document responsive to a Request that Petitioner withholds on the basis of privilege, Petitioner 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

6. “Petitioner” means Shenzhen Pincan Technology Co., Ltd and all its current and former parents, subsidiaries, affiliates, predecessors, successors, employees, managers, officers, directors, partners, agents, representatives, attorneys, or anyone acting or purporting to act on its behalf or control. For the avoidance of doubt, Petitioner includes Chunmei Peng as well as any lawyers (past or present) at the law firm of Glacier Law LLP, including Yu-Hao (Mickey) Yao.

7. “Mosaic” means Mosaic Brands Inc. d/b/a Storus and all its current and former parents, subsidiaries, affiliates, predecessors, successors, employees, managers, officers, directors, partners, agents, representatives, attorneys, or anyone acting or purporting to act on its behalf or control. For the avoidance of Mosaic includes Mia Kaminski, Scott Kaminski, and any lawyers (past or present) at the law firm of SML Avoccati P.C., including Stephen M. Lobbin and Josh Osborn.

8. “Patent” means U.S. Patent No: 10,791,808.

9. The term “Communication” shall mean the transmittal of information, in the form of facts, ideas, inquiries, or otherwise.

III. REQUESTS

A. *Special Interrogatories*

10. Interrogatory No. 1: Identify all dates when Petitioner communicated with Mosaic, outside of communications in which Patent Owner (or its counsel)

was involved, in calendar year 2023. For each such communication, describe the subject matter (using the definition of that term contained in the Instructions above) of the communication at the level of detail that would be required for a privilege log.

11. Interrogatory No. 2: Identify, by amount, date and purpose of payment, all payments, including without limitation subscription fee payments and initiation payments, made by Mosaic to either Petitioner or to Dr. Kimberly Cameron (or her employer, Engineering Systems Inc.) in calendar year 2023.

B. RFPs

12. RFP 1: All agreements between Petitioner and Mosaic at any time.

13. RFP 2: All communications, and all documents evidencing communications, between Petitioner and Mosaic at any time.

C. Deposition Request

14. If Petitioner provides a declaration from a witness familiar with the documents it is producing, Patent Owner requests a 4-hour deposition of that witness.

Respectfully Submitted:

/s/ Benjamin E. Weed
Benjamin E. Weed
Reg. No. 65,939
Lead Counsel for Patent Owner