

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SCOUT ENERGY MANAGEMENT, LLC, and
CHEVRON U.S.A. INC.,
Petitioners,

v.

PILOT INTELLECTUAL PROPERTY, LLC,
Patent Owner.

Case IPR2024-00385
Patent 8,505,332 B1

**PATENT OWNER'S
PROPOSED DISCOVERY REQUESTS**

Patent Owner Pilot Intellectual Property, LLC (“Pilot”) requests that Petitioners Chevron U.S.A. Inc. (“Chevron”) and Scout Energy Management, LLC (“Scout”) produce the following documents within two weeks of the order granting the Motion for Additional Discovery.

Definitions and Instructions

1. Composition means the composition of the stream specified as the mole percent of each component of the stream, under conditions in which the Mabee NGL Recovery unit is being “operated as designed,” as described in the Hydrate Formation paper (Ex. 2012).

2. The Piping and Instrumentation Diagrams (P&IDs) can be limited to those for the NGL Recovery unit added to the existing compressor station at the Mabee gas plant, as described in the Hydrate Formation paper (Ex. 2012).

3. For Request for Production No. 3, documents requested are limited to those already discovered by Petitioners in their preparation, filing, and prosecution of this Inter Partes Review, and the Houston, Texas federal court parallel litigation, and does not require any search for additional information not already discovered by Petitioners.

4. For Request for Production No. 4, if Chevron and/or Scout assert(s) that it is unreasonably burdensome to produce documents sufficient to show the value that Chevron and/or Scout placed on the Mabee gas plant NGL Recovery unit for

Scout's purchase of the Mabee gas plant from Chevron, any such party may, in lieu of producing such documents, produce documents sufficient to show its most recent four years of revenue from sales of NGL recovered in the Mabee gas plant NGL Recovery unit. For Chevron, its most recent four years of revenue would be the four years prior to its sale of the Mabee gas plant to Scout.

Requests for Production

Request for Production No. 1: Produce the most recent version of the Piping and Instrumentation Diagrams (P&IDs) and Plot Plan for the Mabee gas plant.

Request for Production No. 2: Produce documents sufficient to show the composition of the inlet and outlet streams for each of the following components of the Mabee gas plant, as described in the Hydrate Formation paper (Ex. 2012).

- a) Glycol Dehydration outlet stream to NGL Distillation tower inlet. (See attached Ex. 2012, Fig 3, Item No. 1 (annotated).)
- b) NGL Distillation tower top stream, after the Reflux Condenser. (See attached Ex. 2012, Fig 3, Item No. 2 (annotated).)
- c) NGL Distillation tower bottoms stream, after the Reboiler, and the inlet of the NGL Sweetening Step. (See attached Ex. 2012, Fig 3, Item No. 3 (annotated).)
- d) The outlet(s) of the NGL Sweetening Step, and the inlet of the NGL Product Storage and Sales step. (See attached Ex. 2012, Fig 3, Item No. 4 (annotated).)

Request for Production No. 3: Produce any documents evidencing that Chevron designed, built, and/or operated the Mabee gas plant NGL Recovery unit based on the NGL recovery process that Pilot Energy Solutions, LLC and Holloman Corporation disclosed to Chevron.

Request for Production No. 4: Produce documents sufficient to show the value that Chevron and/or Scout placed on the Mabee gas plant NGL Recovery unit for Scout's purchase of the Mabee gas plant from Chevron.

Dated this ____th day of _____, 2024.

/Charles J. Rogers/
Charles J. Rogers
Reg. No. 38,286
Conley Rose, P.C.
777 North Eldridge Parkway, Suite 600
Houston, Texas 77079-4425
Phone: (713) 238-8049
Fax: (713) 238-8008
E-mail: CRogers@conleyrose.com

Lead Counsel for Patent Owner
Pilot Intellectual Property, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), I hereby certify that on _____, 2024
the foregoing *Patent Owner's Discovery Requests* is being served electronically by
agreement of the parties, by e-mail to the following counsel of record.

Brian W. Oaks
McDermott Will & Emery LLP
300 Colorado Street, Suite 2200
Austin, TX 78701
Tel. (512) 726-2574
Lead Counsel for Petitioner
Scout Energy Management, LLC

BOaks@mwe.com
ScoutMWETeam@mwe.com

Alexander T. Pila
McDermott Will & Emery LLP
300 Colorado Street, Suite 2200
Austin, TX 78701
Tel. (512) 298-4558
Back-Up Counsel for Petitioner
Scout Energy Management, LLC

APila@mwe.com

Naveen Modi
Daniel Zeilberger
Michael A. Wolfe
Paul Hastings LLP
2050 M St., N.W.,
Washington DC, 20036
Tel. (202) 551-1700
Back-Up Counsel for Petitioner
Chevron U.S.A. Inc.

Pilot-Chevron@paulhastings.com

/Charles J. Rogers/

Charles J. Rogers

Reg. No. 38,286

Conley Rose, P.C.

777 North Eldridge Parkway, Suite 600

Houston, Texas 77079-4425

Phone: (713) 238-8049

Fax: (713) 238-8008

E-mail: crogers@conleyrose.com

Lead Counsel for Patent Owner

Pilot Intellectual Property, LLC

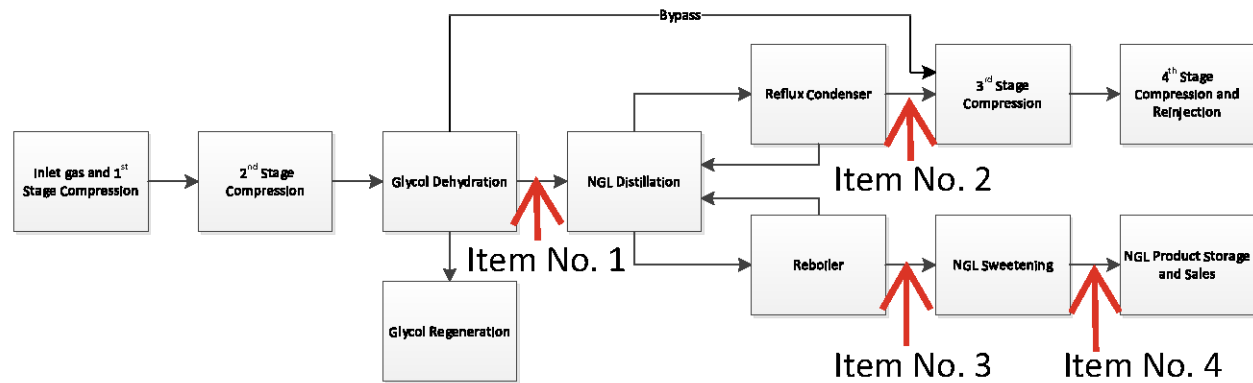


Figure 3: Mabee Gas Plant Block Flow Diagram