**IN THE UNITED STATES DISTRICT COURT**
**FOR THE WESTERN DISTRICT OF WISCONSIN**

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| MCP IP, LLC,<br><br>Plaintiff,<br><br>v.<br><br>RAVIN CROSSBOWS, LLC,<br><br>Defendant. | §<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§ | Case No. 3:23-CV-00142-JDP |

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**MCP'S RESPONSES TO DEFENDANT RAVIN CROSSBOWS, LLC'S FIRST SET OF INTERROGATORIES (NOS. 1-18)**

Plaintiff MCP IP, LLC ("MCP"), serves the following responses and objections to Defendant Ravin Crossbows, LLC's ("Ravin") First Set of Interrogatories under Fed. R. Civ. P. 26 and 33.

**GENERAL OBJECTIONS**

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## INTERROGATORIES

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**INTERROGATORY NO. 4:**

For each Patent-in-Suit, describe in detail any discussions, disclosures, demonstrations, or presentations that were public or not subject to confidentiality obligations concerning the claimed inventions of such patent that occurred before the filing date of such patent, including but not limited to the date(s) of such discussions, disclosures, demonstrations, or presentations and all persons present, the person or entity making such discussions, disclosure, demonstrations, or presentations, and identify supporting documents by bates number concerning the information sought in this Interrogatory.

**RESPONSE:**

MCP objects to this interrogatory as overbroad and unduly burdensome to the extent that it seeks discussions, demonstrations, or presentations "concerning" the claimed inventions which could include any material involving crossbows or vertical bows and further by seeking information that postdates the priority dates of the Patents-in-Suit. MCP further objects to this interrogatory as the term "discussion" is vague and ambiguous. Subject to the general and specific objections, MCP states that the earliest such "disclosures, demonstrations, or presentations that were public or not subject to confidentiality obligations" was the shipment of a demonstration model of the 2009 Mission Menace bow to Bill Krenz of Bow Report in the last quarter of 2008. He was allowed to test the Mission Menace and ultimately wrote the article produced as MCP_2_823-24. MCP may supplement this interrogatory answer as discovery continues.

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**RESPONSE:**

MCP objects to this interrogatory as overbroad and unduly burdensome. MCP further objects to extent that this interrogatory seeks irrelevant information, such as the date of "conception" and "diligence" for certain Patents-in-Suit. MCP further objects to the extent that this interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Subject to the general and specific objections, MCP states that the earliest reduction to practice of the asserted claims of Patents-in-Suit 8,683,989 and 9,909,831 occurred during the

development of the Mathews Monster line of vertical bows and/or the Mission Menace vertical bow. MCP is currently seeking confirmation regarding the first date of such prototype bows, but a demonstration model of the 2009 Mission Menace was shipped to Bill Krenz of Bow Report in the last quarter of 2008. Krenz tested the Mission Menace bow and ultimately wrote the article produced as MCP_2_823-24. The reduction to practice of the claims of U.S. Patent 9,354,017 occurred no later than the '017 patent's earliest effective filing date of September 30, 2009. MCP may supplement this interrogatory answer as discovery continues.

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Dated: January 5, 2024

**HANSEN REYNOLDS LLC**

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*Attorneys for Plaintiff MCP IP, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via electronic mail on January 5, 2024.

By: *s/ Timothy M. Hansen*