

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION
Case No. 1:23-cv-00261-WCG**

Tangent Technologies, LLC,	)	
	)	
Plaintiff,	)	
	)	DEFENDANT RECYCLED
v.	)	PLASTICS INDUSTRIES, LLC’S
	)	AMENDED NOTICE OF RULE
Recycled Plastics Industries, LLC,	)	30(b)(6) DEPOSITION TO
	)	PLAINTIFF TANGENT
Defendant.	)	TECHNOLOGIES, LLC
	)	
	)	

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Recycled Plastics Industries, LLC (“RPI”) will take the deposition of the representative(s) of Plaintiff Tangent Technologies, LLC (“Tangent”) on March 12, 2024, beginning at 9:00 a.m. CST, at Regus – Cornerstone @ Cantera, 4320 Winfield Road, Suite 200, Warrenville, IL 60555. The deposition will be taken before a court reporter, Notary public, or other person duly authorized to administer oaths. The deposition will be recorded by stenographic, audio, and/or videotape means for purposes of discovery, for use at trial, and for such other purposes authorized or permitted under the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Tangent is required to designate one or more officers, directors, managing agents, or other persons who consent to testify knowledgeably on its behalf regarding the subject matter listed in the Topics set forth below.

DEFINITIONS

1. “Plaintiff,” “Tangent,” “You,” or “Your” means Tangent Technologies, LLC, and any and all predecessors, successors, assigns, divisions, subsidiaries, or joint ventures thereof, together with any and all parent or affiliated companies or corporations, and all current and former owners, officers, directors, members, employees, agents, attorneys, representatives, licensees, and any person over which it had or has control, and all other persons acting or purporting to act or that have acted or purported to have acted on behalf of any of the foregoing, with the exception of outside legal counsel in this litigation.

2. “Defendant” or “RPI” means Defendant Recycled Plastics Industries, LLC, and any and all predecessors, successors, assigns, divisions, subsidiaries, or joint ventures thereof, together with any and all parent or affiliated companies or corporations, and all current and former owners, officers, directors, members, employees, agents, attorneys, representatives, licensees, and any person over which it had or has control, and all other persons acting or purporting to act or that have acted or purported to have acted on behalf of any of the foregoing, with the exception of outside legal counsel in this litigation.

3. “And” and “or” as used herein are both conjunctive and disjunctive.

4. “All,” “any,” or “each” as used herein shall be construed to include each of the other terms.

5. “Including” means “including without limitation.”

6. The “’350 patent” shall mean U.S. Patent No. 10,981,350.

7. The “’234 patent” shall mean U.S. Patent No. D819,234.

8. The “’235 patent” shall mean U.S. Patent No. D819,235.

9. “Asserted Patents” shall mean the ’350 patent, the ’234 patent, and the ’235 patent, and any other patents asserted by Tangent in the above-captioned matter.

TOPICS FOR EXAMINATION

1. Conception and reduction to practice of the alleged inventions disclosed and claimed in the Asserted Patents, including the individuals, process(es) and machinery involved.
2. Tangent’s manufacture of any commercial products that practice the alleged inventions disclosed and claimed in the Asserted Patents, including the individuals, process(es) and machinery involved.

Dated: March 6, 2024

Respectfully submitted,

s/ J. Mark Wilson

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Recycled Plastics Industries, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on this date, March 6, 2024, a true and correct copy of the foregoing document was served via email on counsel of record for Plaintiff.

By: s/ J. Mark Wilson