

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

TANGENT TECHNOLOGIES LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 1:23-cv-00261-WCG
RECYCLED PLASTICS INDUSTRIES LLC	)	
	)	Hon. William C. Griesbach
Defendant.	)	
	)	
	)	
	)	

PLAINTIFF’S INITIAL DISCLOSURES

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff Tangent Technologies, LLC (“Tangent” or “Plaintiff”) hereby submits the following Initial Disclosures to Defendant Recycled Plastics Industries, LLC (“RPI” or “Defendant”). These disclosures are based upon information presently and reasonably available and specifically known to Plaintiff. Plaintiff reserves the right to modify, amend, and/or supplement the disclosures made herein as additional evidence and information becomes available.

Plaintiff submits these disclosures without waiving any applicable privilege, immunity, or right to object to admissibility at trial of any information contained in or derived from these disclosures. Plaintiff’s production of anything, whether documents or information, is not and shall not be construed as an admission of the relevance or admissibility into evidence of such document or information. Plaintiff expressly reserves the right to object to the relevance or admissibility of any document or information disclosed, and reserves any other applicable objections it may have, including but not limited to, objections based on the attorney-client privilege, the attorney work product doctrine, burden, and confidentiality. Further, Plaintiff reserves the right to call any



witness or present any document or tangible thing at trial that is identified through further investigation or discovery or that is identified in Defendant's Initial Disclosures.

I. Individuals Likely to Have Discoverable Information Pursuant to Fed. R. Civ. P. 26(A)(1)(A)(i)

Subject to and without waiving the foregoing objections, Plaintiff identifies the following individuals likely to have discoverable information that Plaintiff may use to support its claims and defenses. Plaintiff does not represent that every individual identified herein necessarily possesses such information or will serve as a witness. As discovery proceeds, Plaintiff reserves the right to add or remove individuals from this disclosure and to modify the categories of information that the following individuals may possess. Plaintiff does not authorize Defendant to communicate with Plaintiff's employees, and all communications with Plaintiff or its employees should be coordinated through Plaintiff's counsel, McDermott Will & Emery LLP ("MWE").

Name	Contact Information	Subject(s) of Information
Andrew Stephens	Tangent Technologies, LLC. Contact through counsel only	He may have information relating to U.S. Patent Nos. 10,981,350, D819,234 and D819,235 (collectively, the "Asserted Patents"), which may include, but is not necessarily limited to: conception, reduction to practice, design, development prosecution, and commercialization.
Francisco Morales	Tangent Technologies, LLC. Contact through counsel only	He may have information relating to the Asserted Patents, which may include, but is not necessarily limited to: conception, reduction to practice, design, development prosecution, and commercialization.

Name	Contact Information	Subject(s) of Information
Tadeusz Rybka	Tangent Technologies, LLC. Contact through counsel only	He may have information relating to the Asserted Patents, which may include, but is not necessarily limited to: conception, reduction to practice, design, development prosecution, and commercialization.
Todd Braun	Tangent Technologies, LLC. Contact through counsel only	He may have information relating to Plaintiff's discussions with third parties regarding the Asserted Patents.
One or more as yet unidentified individual(s)	Unknown	Design, development, testing, and manufacturing of Defendant's Accused Products.
One or more as yet unidentified individual(s)	Unknown	Marketing and sales of Defendant's Accused Products.
One or more as yet unidentified individual(s)	Unknown	Defendant's discussions with third parties regarding Plaintiff, the Asserted Patents, and this lawsuit.
One or more as yet unidentified individual(s)	Unknown	Defendant's knowledge and awareness of the Asserted Patents.

In addition, Plaintiff anticipates retaining expert witnesses who may also be determined to possess (or may assist in locating) relevant information, and who will be identified pursuant to Fed. R. Civ. P. 26 on or before the date called for by the Court's scheduling order. Plaintiff also incorporates by reference the witnesses and their possible subjects of testimony disclosed by Defendant in any Initial Disclosure, those individuals identified by Plaintiff through discovery, declaration, or other means, and those individuals whose names appear on produced documents as if set forth in full herein.

II. Documents, ESI, and Things in Plaintiff's Possession, Custody, and Control Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii)

Plaintiff identifies the following categories of documents and things that it may use to support its claims and defenses. These documents are located primarily at Plaintiff's facilities and/or the offices of its legal counsel, MWE.

1. Documents pertaining to the Asserted Patents, including their prosecution, ownership, and commercial success.
2. Documents and materials regarding Defendant's knowledge of the Asserted Patents and related infringement allegations.
3. Documents and materials regarding Defendant's discussions with third parties regarding Plaintiff, the Asserted Patents, and/or this lawsuit.
4. Documents and materials regarding Plaintiff's discussions with third parties regarding Defendant, the Asserted Patents, and/or this lawsuit.
5. Communications between the parties and between the parties and third parties.
6. Documents to be produced by the parties and any third parties in this litigation.

The above documents may contain or embody Plaintiff's proprietary and confidential information. Until the Court enters a protective order, all documents produced or made available for inspection or copying in this case shall be treated by the receiving party as Outside Counsel's Eyes Only. Plaintiff reserves the right to withhold from production any material that falls into the above categories, but is (1) subject to attorney-client privilege, the work product doctrine, or confidential treatment under the terms of any protective order entered in this case; or (2) duplicative, cumulative, or irrelevant. Plaintiff also reserves the right to rely upon any document otherwise produced in connection with this lawsuit, including exhibits, documents identified by the parties in this litigation, and any document that may be in the parties' possession, custody, or

control, including, without limitation: technical documents, specification sheets, data sheets, testing documents, test reports, brochures, catalogs, and other materials relating to the Accused Products; marketing, advertising, and promotional documents relating to the Accused Products; and financial information relating to the Accused Products. Plaintiff reserves the right to supplement this list of categories of documents that it may use to support its claims or defenses.

III. Computation of Damages Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii)

Plaintiff seeks past, continuing, or future damages, including Plaintiff's lost profits, a reasonable royalty, and/or Defendant's profits resulting from their infringement of the Asserted Patents, said relief to be trebled pursuant to 35 U.S.C. § 284, and all of Plaintiff's costs and attorneys' fees for this lawsuit pursuant to 35 U.S.C. § 285. Plaintiff reserves the right to provide an expert report on damages pursuant to Fed. R. Civ. P. 26(a)(2) on or before the date when such an expert report would be due. Plaintiff also seeks pre- and post- judgment interest against Defendant and such other relief as the Court deems proper. Plaintiff also seeks injunctive relief barring Defendant from committing acts of infringement.

IV. Insurance Agreements Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv)

Based on information currently available, Plaintiff is not aware of any insurance agreement that may provide coverage related to the current litigation.

Dated: November 30, 2023

Respectfully submitted,

TANGENT TECHNOLOGIES, LLC

By: /s/ James M. Oehler

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CERTIFICATE OF SERVICE

The undersigned certifies that on November 30, 2023, he caused the foregoing
PLAINTIFF'S INITIAL DISCLOSURES to be served upon all counsel of record via electronic
mail.

By: /s/ James M. Oehler