UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVANOS MEDICAL, INC.,

Petitioner,

v.

STRATUS MEDICAL, LLC,

Patent Owner.

Case IPR2024-01209
Patent 10,966,782

Case IPR2024-01210
Patent 10,736,688

Case IPR2024-01211
Patent 10,736,688

Case IPR2024-01212
Patent 10,925,664

PETITIONER'S REQUETS FOR PRODUCTION
Exhibit 1036

I. Instructions

1. In producing documents or other information responsive to these Requests for Production ("RFPs"), Patent Owner is to comply with the Board's Scheduling Order and any other Board Order in this proceeding, and the instructions in the PTAB's Consolidated Trial Practice Guide, 77 Fed. Reg. 48,756 (Jul. 12, 2019).

2. If Patent Owner finds the meaning of any term in any RFP unclear, Patent Owner 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.

3. For any document responsive to a RFP that Patent Owner withholds on the basis of privilege, Patent Owner shall provide a privilege log identifying the document's date, author(s), recipients(s), subject matter, and the basis of the asserted privilege.

4. Patent Owner shall provide to Petitioner documents, information, and things responsive to all RFPs herein in a native format within 10 business days of service of the RFPs.

II. Definitions

The following definitions shall apply to the RFPs below:

1. References to "Stratus" or "Patent Owner" means Stratus Medical, LLC and any related entities, including any parents, subsidiaries, or affiliates.

2. References to the "Nimbus® Multitined Expandable Electrode" mean any and all versions of the Nimbus® Multitined Expandable Electrode sold or marketed by Stratus.

3. References to "Nimbus® Multitined Expandable Electrode Product Code(s)" means any and all product codes associated with versions of the Nimbus® Multitined Expandable Electrode sold or marketed by Stratus, including but not limited to the product codes NIM-050-10BB, NIM-100-10BB, NIM-100-10BB-CS, and NIM-150-10BB.

4. References to the "Nimbus® Probe RF Thermocouple Electrode" mean any and all versions of the Nimbus® Probe RF Thermocouple Electrode sold or marketed by Stratus.

5. References to "Nimbus® Probe RF Thermocouple Electrode Product Code(s)" means any and all product codes associated with versions of the Nimbus® Probe RF Thermocouple Electrode sold or marketed by Stratus Medical, LLC, its affiliates, or subsidiaries, including but not limited to the product codes NRP-50-27N, NRP-100-27-N, NRP-150-27-N, NDP-50-27-SS, NDP-100-27-SS, and NDP-150-27-SS.

6. References to "fiscal year" means the fiscal years referenced in the chart depicting Stratus's U.S. Revenue provided in paragraph 15 of Cody Jorgensen's declaration (Patent Owner's Exhibit 2015).

III. Petitioner's Requests for Production

1. **RFP No. 1**: Documents sufficient to show Patent Owner's sales in units, gross revenue, and net revenue for each Nimbus® Multitined Expandable Electrode Product Code (including a description of the device associated with each product code) for each of the fiscal years 2020, 2021, 2022, 2023, and 2024.

2. **RFP No. 2**: Documents sufficient to show Patent Owner's sales in units, gross revenue, and net revenue for each Nimbus® Probe RF Thermocouple Electrode Product Code (including a description of the device associated with product code) for each of the fiscal years 2020, 2021, 2022, 2023, and 2024.

3. **RFP No. 3**: All documents and electronically stored information relied on by Cody Jorgensen to prepare the information in paragraphs 16 through 27 (and the associated charts and graphics) of his declaration (Patent Owner's Exhibit 2015).

4. **RFP No. 4**: Documents sufficient to show the annual expenditure (including all monies spent and resources assigned) by Stratus in marketing and advertising the Nimbus® Multitined Expandable Electrode and Nimbus® Probe

RF Thermocouple Electrode products in the United States during each of the fiscal years 2020, 2021, 2022, 2023, and 2024.

5. **RFP No. 5**: Two physical samples of each device "personally inspected" by Peter Crosby according to paragraph 21 of his declaration (Patent Owner's Exhibit 2006).

6. **RFP No. 6**: All materials and communications submitted by Stratus to Deloitte for consideration to be included in the 2024 Deloitte Technology Fast 500™ list, including the application that Stratus was required to submit for consideration (e.g., https://www2.deloitte.com/content/dam/Deloitte/us/Documents/technology/Fast500_AppPacket.pdf).

7. **RFP No. 7**: All materials and communications submitted by Stratus to Pepperdine for consideration to be included in the 2024 Pepperdine Graziadio Most Fundable Companies® list, including information that Stratus was required to submit in response to a questionnaire for consideration (e.g., https://mfc.pepperdine.edu/?spl=Q).

Respectfully submitted,

Dated: June 17, 2025

/Christopher B. Kelly/
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