

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CROWDSTRIKE, INC.,
Petitioner

v.

GOSECURE, INC.,
Patent Owner

Case Nos. IPR2025-00070
U.S. Patent No. 9,954,872

**PETITIONER'S OPPOSITION TO
PATENT OWNER'S MOTION FOR ADDITIONAL DISCOVERY**

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I. INTRODUCTION

Additional discovery is permitted only when “necessary in the interest of justice.” 35 U.S.C. § 316(a)(5). Patent Owner’s (“PO”) motion (“Motion”) for additional discovery fails this standard for three key reasons.

First, the unique nature of this case—based on an earlier disclosure in the public domain that resulted in improper claim scope recapture—makes any purported copying essentially irrelevant. The Petition established that the ’872 Patent is obvious over PO’s own Capalik patent application publication and that both include materially identical disclosures. Paper 1 at 9-10. For PO to establish copying as a secondary indicia supporting the ’872 Patent’s nonobviousness, it must show that CrowdStrike copied the ’872 Patent, specifically, rather than any material from the public domain Capalik disclosure. Even if there were evidence of any copying (there is not), PO cannot possibly establish that the ’872 Patent was copied in isolation. PO relies primarily on a February 2012 presentation that it contends Mr. Alperovitch received in support of its allegation that Mr. Alperovitch learned of the ’872 Patent’s priority application. But this same presentation also details the prior art, Capalik. Thus, even assuming material was copied (it was not), it is impossible for PO to establish whether it was copied from the ’872 Patent’s priority application or from the materially identical disclosure in Capalik. PO ignores this dynamic and

does not attempt to explain how it could possibly show that the '872 Patent's disclosure was copied in isolation from Capalik's teachings.

Second, PO's Motion is futile. Even if PO obtained the requested information, it could not demonstrate a nexus between the '872 Patent claims and any alleged copying, industry praise, or commercial success. PO must first show that CrowdStrike's system practices the '872 Patent claims before it could possibly establish a nexus between the '872 Patent claims and any copying, industry praise, or commercial success. But PO does not seek information from which this could be shown. The claims require specific data structures (e.g., "a data structure that identifies the activity sources, the activity targets, and the associations") and specific communications (e.g., "transmitting to one or more computer systems other than the first computer system information identifying one or more of the activity sources, the activity targets, and the associations"). '872 Patent at Claim 1. Yet PO's technical request seeks "[d]ocuments sufficient to show the architecture of Falcon Host in 2012-2014[,]" which likely describe Falcon Host at a higher level than that specified by the claims. *Motion* at 9. From this, PO simply cannot show that CrowdStrike does now, or ever has, implemented features that embody the '872 Patent claims. Instead, to establish the required nexus would require PO to obtain much more detailed material from CrowdStrike, potentially including source code, which PO does not

request and which the Board has deemed an inappropriate target of additional discovery. *See* Patent Trial and Appeal Board Consolidated Trial Practice Guide (“CTPG”) at 116 (84 Fed. Reg. 64,280 (Nov. 21, 2019)). Further, even if the requested information was sufficiently detailed to show that CrowdStrike’s system in 2012-2014 embodied what was eventually claimed by the ’872 Patent in 2018, PO cannot show that any such functionality was *retained* in CrowdStrike’s system after 2014. Yet PO asks for sales data from 2013-2024. It is impossible to show sales have a nexus to the patent from 2015-2024, for example, if PO has no evidence of the system functionality during that timeframe. Accordingly, even if it obtained the requested information, PO could not establish that any copying, industry praise, or commercial success has a nexus with the ’872 Patent claims.

The futility of PO’s requests regarding secondary indicia of nonobviousness suggests that PO’s Motion has another purpose. It appears PO is seeking to use this additional discovery mechanism as a backdoor to obtain discovery for its parallel lawsuits—an improper purpose that falls far outside the interest of justice. *33Across, Inc. v. Leftsnrights, Inc.*, IPR2018-01480, Paper 24 at 9 (PTAB May 7, 2019). Specifically, PO has initiated a series of trade secret cases against Petitioner alleging that proprietary information was stolen in the 2012 timeframe—the same exact timeframe that is the focus of PO’s current discovery requests. Ex. 1031; Ex. 1033.

Crucially, PO failed to identify in its first trade secret action in California any purported trade secrets with reasonable particularity, a statutory prerequisite for PO to commence discovery under California Code of Civil Procedure section 2019.210. Petitioner accordingly refused to provide discovery. Rather than responding to Petitioner's multiple demurrers to PO's multiple complaints in the California trade secret action or identify PO's purported trade secrets in the California trade secret action it filed, PO dismissed that case without prejudice and then refiled *another* trade secret case based on the same allegations in Texas state court. Ex. 1032 (Texas Complaint), Ex. 1033 (California Complaint). PO's requests here would give it the information it needs to manufacture purported trade secrets that exactly happen to match Petitioner's independently developed technology. This would allow PO to make an end-run around state court trade secret discovery sequencing rules that require PO to identify its trade secrets *before* getting into Petitioner's files. The Motion's requests do not elicit information that would come close to supporting secondary indicia of nonobviousness, but they do target information PO has unsuccessfully sought in its other lawsuits. Similar attempts have been previously rejected by the Board. *33Across*, Paper 24 at 9 ("We agree with Petitioner that it would not be in the interests of justice to permit Patent Owner to use this review [IPR] to conduct discovery otherwise cannot currently seek in district court.").

II. THE MOTION ELICITS INFORMATION IRRELEVANT TO THIS PROCEEDING AND MISUSES THE PTAB’S DISCOVERY PROCESS

A. The Proposed Discovery Would Not be Relevant or Useful to Secondary Considerations of Non-Obviousness

“Case law requires that a nexus be established between the merits of the claimed invention and the evidence proffered on secondary considerations, if the evidence on secondary considerations is to be given substantial weight in the calculus of obviousness/nonobviousness.” *Ashland Oil, Inc. v. Delta Resins & Refractories, Inc.*, 776 F.2d 281, 306 n.42 (Fed. Cir. 1985). PO asserts that its discovery requests will establish objective “copying, industry praise, and commercial success, as well as nexus for these indicia.” *Motion* at 8. The ’872 Patent claims require monitoring activities, generating specific data structures representing the monitored activities, and communicating the information contained in those data structures to other computer systems. ’872 Patent, Claim 1. How CrowdStrike’s system stores and communicates monitored information are low-level, functional details described in lower-level materials (e.g., source code). But PO does not—and cannot reasonably—request that sort of information.¹ So even if PO obtained all requested information, it cannot establish the requisite nexus.

¹ The Board has deemed source code an inappropriate target of discovery. *See* CTPG at 116 (“[P]roceedings before the Board rarely, if ever, require analysis of computer

Request No. 3 seeks documents “sufficient to show the architecture of Falcon Host in 2012-2014.” *Motion* at 9. This request is ostensibly designed to show that technical features allegedly taken from the ’872 Patent’s priority application were implemented in CrowdStrike’s system. *Id.* at 11. But documents describing the “architecture,” even if produced, would describe software components, and do not necessarily include the technical, functional detail needed to compare the evidence to the claim limitations of the ’872 Patent.

Request Nos. 1 and 2 fare no better. They seek documents allegedly showing that CrowdStrike had access to GoSecure’s patented technology. But mere access is not copying, and the Board has routinely rejected arguments based on such speculation. *See, e.g., Ashworth Bros., Inc. v. LAITRAM, L.L.C.*, IPR2020-00593, Paper 17, 4 (PTAB Oct. 28, 2020) (“Patent Owner does not provide any evidence ‘tending to show beyond speculation’ that the acknowledged access by Petitioner resulted in copying”). The speculative nature is particularly acute here—a case that involves an earlier disclosure of prior art in the public domain that resulted in improper claim scope recapture. Specifically, the Petition established that the ’872

source code.”); *see also Snap Inc. v. SRK Tech. LLC*, IPR2020-00819, Paper 23 (PTAB Jan. 8, 2021) (denying discovery where PO sought source code to show how a product functions).

Patent is obvious over PO's own Capalik publication. The Motion alleges that Mr. Alperovitch learned of the '872 Patent's priority application in a February 2012 meeting. *Motion* at 2-3 (citing presentation Ex. 2100 at 36). But PO ignores that the same presentation provides the same level of detail about Capalik. Ex. 2100 at 34. Accordingly, if one of CrowdStrike's founding members ever gained knowledge of the '872 Patent's priority application, they would have simultaneously gained knowledge of Capalik. Even if Mr. Alperovitch—one of many co-founders—relied on concepts from the 2012 meeting to launch the Falcon Platform (he did not), PO offers no explanation as to how Mr. Alperovitch could have copied only the '872 Patent's teachings in isolation from Capalik's.

Request No. 4 seeks “[c]ustomer surveys” for the Falcon Host system. PO cannot show that CrowdStrike's system even practices the '872 Patent claims because necessary details are low-level and not discernable from the use of the system or from the information PO possesses and requests. It does not explain how customer surveys containing some praise could possibly be connected to low-level functionality at the level described in the claims. Request No. 5 seeks “[s]ales data” of the Falcon Host from 2013-2024. As the Board regularly holds, raw sales numbers cannot support commercial success with a sufficient nexus to the claimed invention. *See Garmin Intl., Inc. v. Cuozzo Speed Technologies LLC*, IPR2012-00001, Paper

26 at 8 (PTAB Mar. 5, 2013) (“[Patent owner] has not made a sufficient threshold showing that the requested sales and pricing information are for units the sales of which are due to an inventive feature claimed”); *Atlas Copco Tools and Assembly Systems LLC v. Wildcat Licensing WI LLC*; IPR2020-00891/IPR2020-00892, Paper 37 at 9-10 (PTAB Mar. 18, 2021) (finding that discovery related “sales” and “date of first release” of Petitioner’s product would not support a showing of the required nexus, copying, or commercial success); *Wolfspeed, Inc. v. Cao Lighting, Inc.*, No. IPR2022-00847, Paper 27 at 7 (PTAB Dec. 21, 2022) (“[R]aw sales numbers have little value in determining ‘commercial success.’”). That PO cannot demonstrate Falcon Host practices the ’872 Patent claims makes this request particularly futile.

B. Patent Owner Seeks to Improperly Use PTAB Procedure to Obtain Discovery for Litigation Before Other Tribunals

PO’s current requests are clearly aimed at obtaining information for it to use in the underlying litigation between the parties. PO has filed three different lawsuits against CrowdStrike relevant to this dispute. In the Western District of Texas, PO brought a patent infringement suit asserting the ’872 patent. *GoSecure Inc. v. CrowdStrike, Inc., et al.*, No. 1:24-cv-00526, Dkt. 1 (W.D. Tex. filed May 16, 2024) (Ex. 1030). It also filed a separate state court action in California alleging trade secret misappropriation (the “California Case”), dropping that case and re-filing that case

in Texas state court. *GoSecure, Inc. v. Dmitri Alperovitch, et al.*, No. 24-civ-07161 (Cal. Super. Ct., San Mateo Cnty. filed Nov. 15, 2024) (Ex. 1031); *GoSecure, Inc. v. CrowdStrike, Inc., et al.*, No. 25-BC03A-0012 (Bus. Ct. Tx, 3d Div.) (Ex. 1033). In the patent case, PO served broad discovery requests substantially overlapping with the five requests it now seeks to compel in this IPR, including requests for confidential product architecture, sales data, and documents relating to Mr. Alperovitch's alleged knowledge of the '872 patent. Ex. 2025 at 10–15.

The trade secrets cases are particularly relevant here. In the California Case, CrowdStrike objected to discovery requests under California Code of Civil Procedure § 2019.210, which requires a plaintiff to identify its alleged trade secrets with reasonable particularity before commencing discovery. This rule is designed to prevent a plaintiff from embarking on a fishing expedition to claim after-the-fact that what it found in a defendant's files are the purported trade secrets misappropriated from plaintiff. PO declined to adequately identify its trade secrets. Instead, PO filed a motion to compel on July 18, 2025 and the PO dismissed the case prior to any hearing on demurrer or motion to compel and refiled in Texas. Exs. 1032-33.

Now, PO improperly seeks to obtain the discovery it failed to acquire through traditional litigation procedure. PO's Requests Nos. 1–3 are transparently designed to give it the information it needs to attempt to manufacture trade secret

misappropriation claims. Request No. 1 targets internal documents authored by Mr. Alperovitch or Mr. Gould referencing “CounterTack” or “EventHorizon[.]” *Motion* at 9. Request No. 2 seeks internal references to the ’872 patent or its family. Request No. 3 seeks internal architecture documents for Falcon Host. *Id.* These discovery requests are not narrowly crafted to elicit objective indicia of nonobviousness, but instead mirror PO’s broader discovery goals in the federal district court proceedings and the state court trade secret misappropriation proceedings. It is not in the interest of justice to allow PO to leverage the IPR process to circumvent discovery limitations in its parallel lawsuits. *33Across*, Paper 24, 9 (“We agree with Petitioner that it would not be in the interests of justice to permit Patent Owner to use this review [IPR] to conduct discovery otherwise cannot currently seek in district court.”).

III. ADDITIONAL DISCOVERY IS NOT PROPER UNDER THE *GARMIN* FACTORS

A. Patent Owner Does Not Possess A Threshold Amount of Evidence Of Copying

The first *Garmin* factor, whether the movant presents “more than a possibility and mere allegation,” is particularly significant here. *Garmin*, Paper 26 at 7. Under this factor, the Board considers “whether the movant is already in possession of a threshold amount of evidence ‘tending to show beyond speculation that in fact

something useful will be uncovered.” *Id.* at 6, 7 (stating “useful” means “favorable in substantive value to a contention of the party moving for discovery”). PO argues that it already possesses a threshold amount of evidence of copying and that additional discovery will establish a nexus. *Motion* at 2-7, 10-12. But PO offers no evidence beyond mere speculation that Petitioner copied the claimed invention. This factor is dispositive. *See Ashworth*, Paper 17 at 2-3 (finding Factor 1 dispositive where Patent Owner failed to identify evidence of copying beyond speculation).

PO primarily relies on a February 2012 GoSecure Board meeting presentation allegedly attended by Mr. Alperovitch. Ex. 2100; Ex. 2106 at 1. The slides reference several of GoSecure’s then-pending patent applications, including the ’590 application to which the ’872 Patent claims priority. Ex. 2100 at 36. PO argues that this presentation shows Mr. Alperovitch’s awareness of the claimed invention and that CrowdStrike copied these concepts in launching the Falcon Platform in 2013. *Motion* at 2–7. But the slide deck contradicts, rather than supports, PO’s copying theory. First, the slides discuss broad cybersecurity concepts and include only general summaries of the application. PO makes much of the reference to “Key Claims,” but this was not claim language. Ex. 2100 at 32–36. Indeed, the claims of the ’872 patent were not filed until years later in November 2015, long after Mr. Alperovitch left GoSecure in 2012. Ex. 1002 at 316–17. Second, the same

presentation provides the same level of detail about Capalik. Ex. 2100 at 34. As set forth in the Petition, Capalik was published in 2008—well before Mr. Alperovitch joined GoSecure’s board in 2011—and discloses teachings that are materially indistinguishable from the ’872 patent. Paper 1 at 9. Thus, even if Mr. Alperovitch—one of many co-founders—relied on concepts from the 2012 meeting to launch the Falcon Platform (he did not), PO offers no explanation as to how Mr. Alperovitch could have copied only the ’872 Patent’s teachings in isolation from Capalik’s.

PO compares certain Falcon Platform marketing materials to limitations in claims 1 and 2 of the ’872 patent. *Motion* at 4–6. But that is insufficient to establish a nexus. *Liqwd, Inc. v. L’Oréal USA, Inc.*, 941 F.3d 1133, 1138 (Fed. Cir. 2019) (“[T]he proponent of objective evidence offered to show nonobviousness, such as copying, must show that a nexus exists between the evidence and the claimed features of the invention.”); *Atlas Copco*, Paper 37 at 9–10 (denying discovery where PO’s proffered threshold evidence of copying consisted of Petitioner’s product marketing materials lacking technical detail to support a nexus, copying, and commercial success). As discussed above, claim 1 recites monitoring activities, generating specific data structures descriptive of those activities, and transmitting that information to other computer systems. PO does not (and cannot) show that the specific claimed features exist based on CrowdStrike’s public marketing materials,

and PO would likely need to examine source code to identify specific data structures and communications that are implemented by CrowdStrike's system. *Supra* Section II.A. Any alleged similarities do not show "beyond speculation" that copying occurred. *See Ashworth*, Paper 17 at 5–6 (finding that alleged similarities between the parties' patent filings, without more, did not constitute evidence of copying). As to commercial success and industry praise, PO has not made the required threshold showing of nexus. *Supra* Section II.A. The discovery sought—"sales" and "customer survey" data—does not distinguish whether any commercial success or praise was due to claimed features of the '872 patent, as opposed to unrelated functionality offered in the Falcon Platform. *See Garmin*, Paper 26 at 8.

B. Patent Owner's Requests Are Vague and Overly Burdensome

Garmin factors 4 and 5 address whether the discovery requests are "easily understandable" and whether the requests are "sensible and responsibly tailored according to a genuine need." *Garmin*, Paper 26 at 6-7. Both factors favor denying the Motion.

PO's requests fail *Garmin* factor 4 because they are vague, ambiguous, and not "easily understandable[.]" For example, Requests Nos. 3-5 use undefined and overbroad terms such as "architecture," "sales data," and "customer surveys," related to the "Falcon Host." *Motion* at 9. Yet the Motion alleges that the "Falcon

Platform”—a broader system—allegedly embodies the claimed invention. *Id.* at 4–5. PO’s copying allegations compare claim limitations of the ’872 patent to features of the Falcon Platform, but PO’s requests target only the Falcon Host. *Id.* at 4–6. This inconsistency is significant. The Falcon Platform comprises multiple products/modules and no longer includes any product/module called Falcon Host. Accordingly, it is unclear whether PO seeks information about the earlier product Falcon Host alone or the now broader Falcon platform it identifies as embodying the claims. Similar ambiguities exist in Request Nos. 4 and 5. Request No. 4 seeks “customer surveys,” but fails to define what qualifies as a survey (e.g., informal feedback, structured questionnaires, etc.). *Motion* at 9. Request No. 5 seeks “sales data of the Falcon Host from 2013–2024,” but does not specify whether that includes revenue, contract terms, unit sales, or other metrics. *Id.*

PO’s requests are also unduly burdensome under *Garmin* factor 5. Each request is overbroad in scope, and vague in terminology. Requests Nos. 1–3 seek broad categories of internal documents without targeting specific custodians or timeframes. Request No. 1 concerns two former CrowdStrike employees who left the company several years ago, and implicate years of archived documents, emails or legacy files. Request No. 2 spans a nine-year period and lacks custodian or subject-matter limits. Request No. 4 would require identifying potential “customer

surveys” from as early as 2012, likely scattered across departments or legacy systems, and reviewing them for responsiveness and possible redaction to address privacy and other concerns. Request No. 5 seeks sales data for Falcon Host over a 12-year span. Particularly where the requested information cannot support secondary indicia of nonobviousness, these overbroad requests are overly burdensome and should be denied.

C. Remaining *Garmin* Factor 2 Weigh Against Additional Discovery

PO has not shown that *Garmin* factor 2 supports granting its motion. As discussed above, PO’s discovery requests are a transparent attempt to use this proceeding as a backdoor to obtain documents for use in its parallel lawsuits. *Supra* Section II.B. In essence, PO is attempting to use the PTAB’s additional discovery mechanism to obtain discovery it seeks in the parallel litigation matters while avoiding the specific limitations placed on discovery in those matters. This attempt is not “in the interest of justice.” *Garmin*, Paper 26 at 13.

IV. CONCLUSION

Petitioner respectfully requests that the Board deny PO’s motion for additional discovery.

Dated: September 30, 2025

Respectfully submitted,

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APPENDIX OF EXHIBITS

Exhibit 1001	U.S. Patent No. 9,954,872 (the “’872 Patent”)
Exhibit 1002	File History for U.S. Patent 9,954,872 (the “’872 File History”)
Exhibit 1003	Markus Jakobsson Declaration (“ <i>Dec.</i> ”)
Exhibit 1004	U.S. Application Publication No. 2008/0016570 to Capalik (“ <i>Capalik</i> ”)
Exhibit 1005	Ashvin Goel et al. “ <i>Forensix: A Robust, High-Performance Reconstruction System</i> ,” Proceedings of the 25th International Conference on Distributed Computing Systems Workshops, 2005 (“ <i>Goel</i> ”)
Exhibit 1006	Samuel T. King, “ <i>Analyzing Intrusions Using Operating System Level Information Flow</i> ,” Dissertation submitted in partial fulfillment of the requirements for the degree of Doctor of Philosophy in The University of Michigan, 2006 (“ <i>King</i> ”)
Exhibit 1007	U.S. Patent No. 8,819,822 to Pike et al. (“ <i>Pike</i> ”)
Exhibit 1008	U.S. Patent No. 7,089,428 to Farley et al. (“ <i>Farley</i> ”)
Exhibit 1009	Declaration of June A. Munford (“ <i>Munford Dec.</i> ”)
Exhibit 1010	IPR2025-0068 of U.S. Patent No. 9,954,872
Exhibit 1011	WO 2004/097584 to Knight (“ <i>Knight</i> ”)
Exhibit 1012	U.S. Application Publication No. 2006/0242701 to Black et al. (“ <i>Black</i> ”)
Exhibit 1013	U.S. Application Publication No. 2007/0208822 to Wang et al. (“ <i>Wang</i> ”)
Exhibit 1014	U.S. Application Publication No. 2008/0098476 to Syversen (“ <i>Syversen</i> ”)
Exhibit 1015	U.S. Patent No., 7,483,972 to Bhattacharya et al. (“ <i>Bhattacharya</i> ”)
Exhibit 1016	U.S. Application Publication No. 2005/0193429 to Demopoulos et al. (“ <i>Demopoulos</i> ”)
Exhibit 1017	WO 2009/032379 to Stolfo et al. (“ <i>Stolfo</i> ”)
Exhibit 1018	U.S. Application Publication No. 2004/0103314 to Liston (“ <i>Liston</i> ”)
Exhibit 1019	U.S. Patent No., 8,407,788 to Kestner et al. (“ <i>Kestner</i> ”)
Exhibit 1020	U.S. Application Publication No. 2009/0037672 to Colbert et al. (“ <i>Colbert</i> ”)
Exhibit 1021	WO 2009/097610 to Moffie et al. (“ <i>Moffie</i> ”)
Exhibit 1022	U.S. Patent No., 8,510,827 to Leake et al. (“ <i>Leake</i> ”)
Exhibit 1023	U.S. Patent No., 9,098,698 to Ghosh et al. (“ <i>Ghosh</i> ”)

Exhibit 1024	U.S. Application Publication No. 2007/0220518 to Verbowski et al. (“ <i>Verbowski</i> ”)
Exhibit 1025	GoSecure Opp’n to Mtn. to Dismiss, Dkt. 26, (Aug. 22, 2024), Case No. 1:24-cv-00526-DII
Exhibit 1026	Jointly Proposed Scheduling Order, Dkt. 48-1, (Oct. 25, 2024), Case No. 1:24-cv-00526-DII
Exhibit 1027	GoSecure Complaint (May 16, 2024) Case No. 24-cv-00526
Exhibit 1028	European Patent Office decision to refuse the European Patent application No. 11 729 826.5 (Jan. 15, 2019)
Exhibit 1029	Amended claims rejected in European Patent Office decision to refuse the European Patent application No. 11 729 826.5 (Dec. 7, 2017)
Exhibit 1030	Complaint, <i>GoSecure Inc. v. CrowdStrike, Inc., et al.</i> , No. 1:24-cv-00526 (W.D. Tex. filed May 16, 2024)
Exhibit 1031	Complaint, <i>GoSecure, Inc. v. Dmitri Alperovitch, et al.</i> , No. 24-civ-07161 (Cal. Super. Ct., San Mateo Cnty. filed Nov. 15, 2024)
Exhibit 1032	Notice of Entry of Dismissal and Proof of Service, <i>GoSecure, Inc. v. Dmitri Alperovitch, et al.</i> , No. 24-civ-07161 (Cal. Super. Ct., San Mateo Cnty. filed Nov. 15, 2024)
Exhibit 1033	Complaint, <i>GoSecure, Inc. v. CrowdStrike, Inc., et al.</i> , No. 25-BC03A-0012 (Bus. Ct. Tx, 3d Div.)

**CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.105**

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105, the undersigned certifies that on September 30, 2025, a true and correct copy of the foregoing Petitioner's Opposition to Patent Owner's Motion for Additional Discovery was served electronically on counsel for Patent Owner at the following address:

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