

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RØDE MICROPHONES, LLC AND  
FREEDMAN ELECTRONICS PTY LTD,  
Petitioner,

v.

ZAXCOM, INC.,  
Patent Owner.

Case IPR2025-00231

Patent 7,929,902

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**PETITIONERS' OBJECTIONS AND SUPPLEMENTAL RESPONSES TO  
ZAXCOM, INC.'S INTERROGATORIES  
TO PETITIONER RØDE MICROPHONES, LLC  
AND PETITIONER FREEDMAN ELECTRONICS PTY LTD**

Petitioners RØDE Microphones, LLC (“RØDE”), and Freedman Electronics Pty Ltd. (“Freedman”), serve these objections to Patent Owner Zaxcom, Inc.’s (“Zaxcom’s”) Interrogatories to Petitioner RØDE Microphones, LLC and Zaxcom’s Interrogatories to Petitioner Freedman Electronics Pty Ltd.

### **GENERAL OBJECTIONS**

1. Petitioners object that Patent Owner’s interrogatories are facially overbroad and unduly burdensome. For instance, in district court litigation, in which discovery is broader than in PTAB proceedings, Fed. R. Civ. P. 33 provides a limit of 25 interrogatories for all claims, defenses, and issues that may arise in an entire litigation. Patent Owner, however, requests 19 interrogatories (some compound) on the single discrete legal issue of real party in interest (RPI). Fed. R. Civ. P. 33 also provides for 30 days to object and/or respond whereas here the parties are on a highly compressed timeline, which further exacerbates the burden.

2. Petitioners object to the extent any interrogatory seeks or encompasses information that is privileged or subject to the work-product doctrine.

3. Petitioners object to any interrogatory including the term “Lectrosonics” as being vague and ambiguous, including but not limited to because Zaxcom’s definition of Lectrosonics includes “related companies,” “agents,” “representatives, privies, real parties in interest, or others authorized to act on

Lectrosonics’ behalf.” Zaxcom’s definition thus incorporates the terms of art “privies” and “real parties in interest” that call for legal conclusions as to Zaxcom’s threatened motion to terminate this IPR, incorporates entities that Zaxcom alleges are and were “privies” or “real parties in interest” (including RØDE and Freedman), and incorporates entities that are now related companies only after the May 2025 transaction between Lectrosonics, Inc., and RØDE Microphones, LLC. Petitioners interpret “Lectrosonics” to mean Lectrosonics, Inc.

4. Petitioners object to any interrogatory including the term “RØDE” as being vague and ambiguous, including but not limited to because Zaxcom’s definition of RØDE includes “related companies,” “agents,” “representatives, privies, real parties in interest, or others authorized to act on their behalf.” Zaxcom’s definition thus incorporates the terms of art “privies” and “real parties in interest” that call for legal conclusions as to Zaxcom’s threatened motion to terminate this IPR, incorporates entities that Zaxcom alleges are and were “privies” or “real parties in interest” (including Freedman and Lectrosonics), and incorporates entities that are now related companies only after the May 2025 transaction between Lectrosonics, Inc., and RØDE Microphones, LLC. Petitioners interpret “RØDE” to mean RØDE Microphones, LLC.

5. Petitioners object to any interrogatory including the term “Freedman” as being vague and ambiguous, including but not limited to because Zaxcom’s

definition of Freedman includes “any parent companies,” “agents,” “representatives, privies, real parties in interest, or others authorized to act on behalf of Freedman.” Zaxcom’s definition thus incorporates the terms of art “privies” and “real parties in interest” that call for legal conclusions as to Zaxcom’s threatened motion to terminate this IPR, and incorporates entities that Zaxcom alleges are and were “privies” or “real parties in interest” (including RØDE and Lectrosonics). Petitioners interpret “Freedman” to mean “Freedman Electronics Pty Ltd.”

6. Petitioners object to any interrogatory including the term “The Freedman Group” as being vague and ambiguous, including but not limited to because Zaxcom’s definitions of “You,” “Freedman” and “FREEDMAN ELECTRONICS PTY LTD” include “The Freedman Group,” making all of these terms circular, conclusory and indeterminate.

7. Petitioners object to the definition of “Zaxcom IPRs” as including IPRs for patents other than patent No. 7,929,902 (the “’902 patent”).

8. Petitioners object to any interrogatory including the term “Petitioners” for the same reasons they object to the terms “RØDE” and “Freedman.” Petitioners interpret “Petitioners” to mean “RØDE Microphones, LLC” and “Freedman Electronics Pty Ltd.”

9. Petitioners object to any interrogatory seeking legal conclusions or Petitioners’ contentions.

**SPECIFIC OBJECTIONS AND RESPONSES****INTERROGATORY NO. 1:**

Identify all persons involved in any aspect of the Acquisition including their job titles, roles, and whether they evaluated or considered litigation, IPRs, or intellectual property risks involving Zaxcom or the Zaxcom Patents.

**RESPONSE TO INTERROGATORY NO. 1**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being grossly overbroad and unduly burdensome in requiring identification and explanation as to “all persons involved in any aspect of the Acquisition,” even though that would encompass people and activities having nothing to do with the IPR, RPI, or privity. The interrogatory is also vague and ambiguous because it is unclear if it is limited to persons involved in the acquisition who at any time evaluated IP, Zaxcom, or IPRs, or only performed such evaluations during the acquisition process. It is further ambiguous because it is unclear whether the evaluation or consideration is limited to the context of the acquisition process itself or also encompasses independent evaluation or consideration that happened to be performed during the acquisition process by persons who also happen to be involved in the acquisition. Additionally, this interrogatory is unduly burdensome and not appropriately tailored since it seeks irrelevant information such as who

evaluated litigations and general IP risks involving Zaxcom. Petitioners also object to “evaluated and considered” as being overbroad, vague, and subjective. Petitioners object to this interrogatory as calling for privileged and work product information to the extent that it seeks information about evaluation and/or analysis performed by attorneys. Petitioners do not intend to respond to this interrogatory, except as to identify those persons involved in “evaluating, preparing, or filing” of the IPR2025-00231 in response to Interrogatory No. 19.

**INTERROGATORY NO. 2:**

Define the meaning of The Freedman Group and if it is a legal entity, provide its official name and state of formation.

**RESPONSE TO INTERROGATORY NO. 2**

Subject to and without waiving its general objections, incorporated here, Petitioners respond that as they use the term, “The Freedman Group” is an informal designation generally denoting Freedman Electronics Pty Ltd. together with its associated controlled entities. See, e.g., IPR2025-00231-0000790 to IPR2025-00231-0000826 at IPR2025-00231-0000704 (“The directors present their report, together with the financial statements of the Group, being Freedman Electronics Pty Limited (‘the company’) and its controlled entities”); see also IPR2025-00231-0000964 (“Freedman Electronics Group Structure-May 2025”). An entity named “The Freedman Group” is not a separately incorporated legal entity.

**INTERROGATORY NO. 3:**

Identify the dates upon which discussions regarding the Acquisition of Lectrosonics by either of the Petitioners or The Freedman Group began and the dates of all major milestones in the acquisition including, without limitation, date upon which price was agreed upon, dates of any memorandums of understanding were entered (whether called by this name or a different name), and dates of execution of all documents.

**RESPONSE TO INTERROGATORY NO. 3**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being unduly burdensome and calling for irrelevant information, or at least information not reasonable narrowed and tailored to the RPI and privacy issues. For instance, the acquisition was started and closed prior to institution, so the relevance of the timing of these events is absent or minimal as to the legal issues of RPI and privacy. The interrogatory is also overbroad and unduly burdensome in seeking “all major milestones,” which encompasses more than what is reasonably related to RPI or privacy. Indeed, “major milestones” is also vague, ambiguous, and subjective. Petitioners do not intend to answer this interrogatory; however, it is reasonably believed that most, if not all, of the requested information will be discernable from Petitioners’ document production.

**INTERROGATORY NO. 4:**

Identify all legal documents relating to the Acquisition by title and description, and describe generally the legal relationship between Lectrosonics, each Petitioner, and The Freedman Group.

**RESPONSE TO INTERROGATORY NO. 4**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory's use of the term "legal documents" as vague and ambiguous, and Petitioners interpret the term to mean "documents." Petitioners further object to the interrogatory as being grossly overbroad, unduly burdensome, seeking irrelevant information, and not reasonably tailored to the RPI and privacy issues, since it requests identification of "all" legal documents "relating to the Acquisition," even though many will have no relevance to the narrow RPI and privacy issues. Corporate acquisitions entail a myriad of issues, most having nothing to do with RPI or privacy. Petitioners further object to this interrogatory as creating undue burden by targeting privileged "legal documents," documents which, if they exist, would not be produced and therefore would be irrelevant to the RPI inquiry. Petitioners also object to this interrogatory as being improperly compound, as it seeks two disparate sets of information: (1) all documents relating to the Acquisition, and (2) a description of the legal relationships among Lectrosonics, Petitioners, and Freedman Group. Petitioners object to this interrogatory as calling for privileged and work product

information to the extent that it seeks drafts and other documents prepared, sent or received by attorneys and not externally circulated. Petitioners do not intend to answer this interrogatory. However, information requested by this interrogatory that pertains to the RPI and/or privity issue(s) will be presented in Petitioners' answers to Interrogatory Nos. 2 and 16 and will be discernable from Petitioners' document production.

**INTERROGATORY NO. 5:**

State whether you agree that Lectrosonics is subject to a one-year time bar for filing an IPR Petition against Zaxcom for the '902 Patent ("One Year Bar") due to Zaxcom's filing of a patent infringement complaint against Lectrosonics in the Zaxcom Lectrosonics Litigations.

**RESPONSE TO INTERROGATORY NO. 5:**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as calling for legal conclusions and contentions and do not intend to provide an answer.

**INTERROGATORY NO. 6:**

State whether you contend that the company who acquired Lectrosonics has or has not acquired the One Year Bar and explain the basis for your response.

**RESPONSE TO INTERROGATORY NO. 6:**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as calling for legal conclusions and contentions and do not intend to provide an answer.

**INTERROGATORY NO. 7:**

State whether you contend that Lectrosonics is or is not a real party in interest or privy of either of the Petitioners or The Freedman Group and explain the basis for your response.

**RESPONSE TO INTERROGATORY NO. 7:**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as calling for legal conclusions and contentions and do not intend to provide an answer.

**INTERROGATORY NO. 8:**

Describe in detail all analyses or evaluations undertaken by RØDE, Freedman, and/or The Freedman Group concerning whether the acquisition of Lectrosonics by either Petitioner or The Freedman Group could result in a time bar under 35 U.S.C. § 315(b) with respect to IPR2025-00231.

**RESPONSE TO INTERROGATORY NO. 8**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being targeted at and implicating privileged and work product

information since it requests that Petitioners “describe in detail all analyses or evaluations” by Petitioners on a legal issue that could only be performed by an attorney. To the extent there were any non-privileged communications containing such information, they will be produced. Petitioners also object to this interrogatory as improperly calling for Petitioners’ legal conclusions and contentions on the RPI and privity issues. Petitioners also object to this interrogatory as calling for irrelevant information, since the PTAB will decide the legal questions of RPI and privity, and therefore Petitioners’ analysis of the issue is irrelevant. In view of the foregoing, Petitioners do not intend to answer this interrogatory.

**INTERROGATORY NO. 9:**

Identify all persons at RØDE, Freedman, The Freedman Group, or Dechert who discussed, considered, or were made aware of IPR2018-01129 and any possible acquisition/actual acquisition of Lectrosonics by either Petitioner: 1) prior to the filing of IPR2025-00231; and 2) after the filing of IPR2025-00231.

**RESPONSE TO INTERROGATORY NO. 9**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being overbroad, unduly burdensome, and seeking irrelevant information. More particularly, it seeks identification of “all persons” aware of IPR2028-01129 even though this IPR was a public proceeding and persons who may have known about it may not have had any role in the acquisition or IPR2025-00231.

More generally, whether Petitioners were simply aware of IPR2018-01129, a public proceeding, has no to minimal probative value as to whether Lectrosonics is an RPI or privy. Similarly, who became aware of IPR2018-01129 after the filing of IPR2025-00231 is irrelevant to the RPI and privy issues. Petitioners do not intend to answer this interrogatory. However, Petitioners note that their IPR2025-00231 petition—which is available to the public—expressly identifies IPR2018-01129, and Petitioners’ document production will provide information as to the timing of the acquisition.

**INTERROGATORY NO. 10:**

Describe all communications between Petitioners and any third party regarding whether any entity other than RØDE and Freedman should be disclosed as a real party in interest (“RPI”) in connection with the Zaxcom IPRs.

**RESPONSE TO INTERROGATORY NO. 10**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as calling for Petitioners’ legal conclusions and legal contentions on the RPI issue. Similarly, Petitioners object to this interrogatory as calling for irrelevant information, since it is the PTAB who will determine whether any other entity should be disclosed as a RPI. Additionally, Petitioners object to this interrogatory as being duplicative and cumulative with Petitioners’ document production, since any such non-privileged communications, to the extent they exist,

will be produced. In view of the foregoing, Petitioners will not answer this interrogatory.

**INTERROGATORY NO. 11:**

State whether [RØDE/Freedman] has entered into any agreements or understandings with Lectrosonics, [Freedman/RØDE], or The Freedman Group concerning the funding, direction, or strategy of the Zaxcom IPRs, and describe the nature of any such agreement.

**RESPONSE TO INTERROGATORY NO. 11**

Subject to and without waiving their general objections, incorporated here, Petitioners answer that there have been no agreements or understandings between Freedman or RØDE and Lectrosonics concerning the funding, filing, direction, or strategy of either IPR2025-00231 or IPR2018-01129.

**INTERROGATORY NO. 12:**

Identify all policies, procedures, or criteria used by [RØDE/Freedman] for determining whether any third party qualifies as an RPI or privy in connection with the filing of an IPR petition generally, or a Zaxcom IPR specifically, and whether any such policy or procedure was applied to IPR2025-00231 and how it was applied.

**RESPONSE TO INTERROGATORY NO. 12**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being overbroad and unduly burdensome and calling for

information not likely to have relevance to the instant RPI and privacy issues. For instance, such alleged policies and procedures are irrelevant because it is the PTAB who will determine the legal RPI and privacy issues. Petitioners further object that this interrogatory is principally targeted at privileged and/or work product information. More particularly, the interrogatory asks “how” such policies were applied to a legal issue, wherein such application would be performed by counsel. Petitioners further object to this interrogatory as calling for legal conclusions and contentions. Petitioners will not answer this interrogatory.

**INTERROGATORY NO. 13:**

State whether RØDE, Freedman, The Freedman Group, Lectrosonics, or Dechert has determined or believes that Lectrosonics stands to benefit, directly or indirectly, if IPR2025-00231 results in cancellation of one or more claims of the ’902 Patent, and if so, how Lectrosonics will benefit.

**RESPONSE TO INTERROGATORY NO. 13**

In addition to its general objections, incorporated here, Petitioners object to the term “benefit” as being vague and subjective, especially when coupled to the modifier “indirectly.” Petitioners further object to this interrogatory as calling for legal conclusions and contentions.

Subject to and without waiving their general and specific objections, Petitioners answer that Lectrosonics does not stand to benefit, directly or indirectly,

from cancellation of any claims of the '902 patent. Lectrosonics is neither selling products covered by any such claims nor committing any other infringing acts in the U.S. with respect to such claims. This is demonstrated at least by the fact that Zaxcom has not brought suit against Lectrosonics subsequent to the dismissal of Zaxcom's prior district court litigation with Lectrosonics, more than two years ago. See Federal Circuit and D.N.M. litigation documents produced at IPR-00231-0000893 to -946, including specifically IPR-00231-0000924 to -939 (memorandum and order, Feb. 17, 2023); IPR-00231-0000940 to -946 at -946 (docket, D.I. 114).

**INTERROGATORY NO. 14:**

State whether Lectrosonics funded, directed, influenced or controlled any aspect of IPR2025-00231, including without limitation the dollar amount provided by Lectrosonics for all direct or indirect funding of any aspect of IPR2025-00231 and Lectrosonics's provision of documents, filing assistance, legal strategy, or argument selection.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 14**

**CONFIDENTIAL**

In addition to their general objections, incorporated here, Petitioners object to the term "any aspect" as being vague, overbroad, and subjective.

Subject to and without waiving their general and specific objections, Petitioners answer that Lectrosonics provided no funding (direct or indirect),

direction, influence, or control over any aspect of IPR2025-00231, including by providing any documents, filing assistance, legal strategy, or arguments for IPR2025-00231.

While Petitioners contend that it is neither relevant to the RPI inquiry nor within the scope of this interrogatory, Petitioners note that one privileged/work-product document relating to patent invalidity was received from Lectrosonics around the end of February 2025, after the parties had executed the Letter of Intent and NDAs, almost three months after the December 4, 2024 filing of the petition for IPR2025-00231, and while the Zaxcom Inc. v. RØDE Microphones, LLC case (No. 1:23-cv-1245) was pending in Delaware. The document was provided to Chris Lee (Freedman in-house counsel) via Damien Wilson (Freedman CEO) and subsequently to Dechert LLP on March 6, 2025. The document, marked as confidential and attorney-client privileged, comprises an eight-page claim chart of a reference called the “Joey Transcorder CTR-751/V Operating Instructions” as mapped against certain claims of U.S. Patent 9,336,307, and includes attorney comments. The document was originally prepared by Lectrosonics’ outside counsel Justin R. Muehlmeier of Peacock Law P.C.

**INTERROGATORY NO. 15:**

State whether either Petitioner has received a copy of, or otherwise has access to, the attorney-client privileged documents and communications of Lectrosonics

relating to: 1) the Zaxcom IPRs; and 2) the Zaxcom Lectrosonics Litigations, including without limitation settlement offers made in either (1) or (2).

**RESPONSE TO INTERROGATORY NO. 15**

In addition to their general objections, incorporated here, Petitioners object to this interrogatory as being overbroad, unduly burdensome, and seeking information that is irrelevant or of minimal probative value. The Zaxcom IPRs are of public record and the relevance of any associated privileged files is speculative. Similarly, litigation files and settlement offers appear to have no nexus to the instant RPI and privacy issues. Moreover, even if this interrogatory were answered, the answer would at most reveal if Petitioners received a copy or had access to certain unidentified privileged documents and communications, which would not be useful or probative for the RPI and privacy inquiries. Petitioners further object to this interrogatory as being duplicative or of minimal value, in view of the fact that Petitioners will produce any correspondence with Lectrosonics concerning Zaxcom or the IPRs and will answer, subject to their objections, Interrogatory Nos. 11 and 14. In view of the foregoing, Petitioners will not answer this interrogatory.

**INTERROGATORY NO. 16:**

Describe in detail the nature of the corporate, financial, strategic, or operational relationship between: (1) Lectrosonics and RØDE; (2) Lectrosonics and Freedman; (3) RØDE and Freedman; and (3) Lectrosonics and The Freedman

Group, including any shared ownership, control, resources, or coordination and the management of each entity.

**RESPONSE TO INTERROGATORY NO. 16**

In addition to its general objections, incorporated here, Petitioners specifically object to this interrogatory on the ground that the interrogatory's reference to "the strategic...relationship between" the identified pairs of entities and "shared coordination" are vague and ambiguous and Petitioners cannot determine what those terms mean sufficient to address them. Petitioners object that the term "operational relationship" is vague and ambiguous, and Petitioners assume that the interrogatory is asking whether directors and officers of Freedman or RØDE have or will become directors or officers of Lectrosonics, and vice versa.

Subject to and without waiving their general and specific objections, Petitioners answer that following the May 2025 transaction between RØDE and Lectrosonics, RØDE is the owner of 100% of the shares of Lectrosonics, and Lectrosonics is a wholly-owned subsidiary of RØDE. Further, RØDE is a wholly-owned subsidiary of Freedman Electronics Pty. Ltd. ("Freedman"). As for the interrogatory's reference to "The Freedman Group," see the answer to interrogatory 2 above.

As for financial relationships, as a wholly-owned subsidiary of RØDE, it is anticipated that Lectrosonics' post-transaction financial results will be incorporated

into the consolidated financial results of RØDE. RØDE's financial results will continue to be incorporated into the consolidated financial results of Freedman.

As for operational relationships, as stated in the press release announcing the transaction between RØDE and Lectrosonics, "Lectrosonics will continue to operate from its existing facilities in New Mexico, with the current management team remaining in place to ensure continuity and preserve the brand's unique identity and customer relationships."<sup>1</sup> Lectrosonics' officers before and after the transaction were and are:

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<sup>1</sup> <https://lectrosonics.com/the-freedman-group-acquires-lectrosonics-world-leaders-in-uhf-wireless-audio/>.

| <b>PRE-ACQUISITION</b> |                                      | <b>POST-ACQUISITION</b> |                                      |
|------------------------|--------------------------------------|-------------------------|--------------------------------------|
| <b><u>Name</u></b>     | <b><u>Title</u></b>                  | <b><u>Name</u></b>      | <b><u>Title</u></b>                  |
| Wesley Herron          | President                            | Wesley Herron           | President                            |
| Karl Winkler           | EVP product design and distribution  | Karl Winkler            | EVP, product design and distribution |
| Robert Cunnings        | VP, IT, quality assurance, logistics | Robert Cunnings         | VP, IT, quality assurance, logistics |
| David Thomas           | VP, engineering                      | David Thomas            | VP, engineering                      |
| Christine A. Butler    | Secretary                            | Damien Wilson           | Secretary and Treasurer              |

IPR2025-00231-0000; IPR2025-00231-0000951 to -957. Lectrosonics' board members before and after the transaction were and are:

| <b>PRE-ACQUISITION</b> |          | <b>POST-ACQUISITION</b> |          |
|------------------------|----------|-------------------------|----------|
| Wesley Herron          | Director | Wesley Herron           | Director |
| John Gordon Moore      | Director | John Gordon Moore       | Director |
| Christine A. Butler    | Director | Peter Freedman          | Director |
| Lawrence E. Fisher     | Director | Damien Wilson           | Director |
| Leonard L. Layba       | Director | Joe Hockey              | Director |
| Curtis Porter          | Director |                         |          |

IPR2025-00231-0000430 to -440; IPR2025-00231-0000951 to -957. No one from Lectrosonics has become an officer or board director (or board manager, in the case of RØDE, which has a Board of Managers instead of a Board of Directors) of RØDE or Freedman.

Freedman's directors and managers both before and after the Lectrosonics acquisition were and are:

|                       |                       |
|-----------------------|-----------------------|
| Peter Freedman        | Director              |
| Joseph Hockey         | Director              |
| Damien Wilson         | Director              |
| Damien Wilson         | CEO                   |
| Stuart Kipreolis      | Company Secretary/CFO |
| Richard Johnstone     | Revenue manager       |
| Pieter Schiellebeeckx | Technology director   |

IPR2025-00231-0000794. RØDE's Board of Managers both before and after the Lectrosonics acquisition were and are: Peter Freedman and Joseph Hockey. IPR2025-00231-0000463 to -465.

Information responsive to this interrogatory is contained generally at IPR2-25-00231-0000001 to 25-00231-0000826, and 25-00231-0000947 to 25-00231-0000964.

**INTERROGATORY NO. 17:**

State whether the legal, strategic, or business goals of Lectrosonics and any one of RØDE, Freedman, or The Freedman Group are aligned with respect to Zaxcom, the '902 Patent, the Zaxcom IPRs, and the Lectrosonics Accused Products. If so, describe how.

**RESPONSE TO INTERROGATORY NO. 17**

In addition to their general objections, incorporated here, Petitioners object to the terms "goals" and "aligned" as being vague, ambiguous, and subjective. Petitioners also object to this interrogatory as overbroad, unduly burdensome, and seeking irrelevant information. For instance, to the extent that there may be "business goals" that are influenced by Zaxcom, such goals may relate to non-patent issues, patents other than the '902 patent, and/or objective or goals unrelated to the filing or control of an IPR.

Subject to and without waiving their general and specific objections, Petitioners answer that RØDE/Freedman and Lectrosonics are not aligned with respect to the '902 patent, or Zaxcom IPRs. RØDE/Freedman and Lectrosonics manufacture and sell different products. Zaxcom has accused RØDE/Freedman's products of infringing the '902 patent. In contrast, Lectrosonics's products have not been accused of infringing the '902 patent subsequent to the dismissal of the Zaxcom v. Lectrosonics litigation as evidenced by the fact that Zaxcom has not filed any subsequent Complaint against Lectrosonics' products. Therefore, Lectrosonics products are presently unaccused. RØDE/Freedman incorporate their response to Interrogatory No. 13 above. In sum, their interests and goals are not "aligned" with respect to the '902 patent or IPR2025-00231, since the '902 patent is not a threat to Lectrosonics. Additionally, RØDE/Freedman and Lectrosonics interests are not aligned with regard to "Lectrosonics Accused Products" since those products have not been sold since early 2020, three years before the dismissal of the Zaxcom v. Lectrosonics litigation. IPR2025-00231-0000907 (Zaxcom status report); IPR2025-00231-0000913 to -914 (Lectrosonics motion for summary judgment); IPR2025-000231-0000922 to -923 (Moore declaration).

**INTERROGATORY NO. 18:**

State the management teams for each of RØDE, Freedman, Lectrosonics, and the Freedman Group with respect to each company as a whole and with respect to each of the Zaxcom IPRs.

**RESPONSE TO INTERROGATORY NO. 18**

In addition to their general objections as well as specific objections to Interrogatory 16, incorporated here, Petitioners object to this interrogatory as being substantially duplicative of interrogatory No. 16. Petitioners also object to the qualifier phrase “and with respect to each of the Zaxcom IPRs” as being vague and unclear. More particularly, it is not understood how there is a “management team” for an IPR, let alone for both a company and an IPR.

Subject to their general and specific objections, Petitioners incorporate here their answer to interrogatory 16.

**INTERROGATORY NO. 19:**

State the name of all individuals involved in evaluating, preparing, or filing IPR2025-00231 and their respective roles within RØDE, Freedman, The Freedman Group, or Lectrosonics.

**RESPONSE TO INTERROGATORY NO. 19**

In addition to their general objections as well as specific objections to Interrogatory 16, incorporated here, Petitioners object to the terms “involved” and “evaluating” as being vague, ambiguous, and subjective.

Subject to and without waiving their general and specific objections, Petitioners answer that all the individuals involved in evaluating, preparing, and filing IPR2025-00231 were: Jeffrey Plies (Dechert LLP), Michael Fisher (Dechert LLP), and Greg Chuebon (Dechert LLP), as authorized by Chris Lee (Freedman in-house counsel) and Damien Wilson (Freedman CEO).

Date: May 29, 2025

Respectfully Submitted,

By: Jeffrey B. Plies

Jeffrey B. Plies, Reg. No. 46,999

Michael A. Fisher, Reg. No. 42,536

*Counsel for Petitioners RØDE*

*Microphones, LLC, and Freedman*

*Electronics Pty Ltd.*