

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EMBODY, INC. AND ZIMMER BIOMET HOLDINGS, INC.,
Petitioner

v.

LIFENET HEALTH,
Patent Owner.

IPR2025-00248
IPR2025-00249

PATENT OWNER'S DISCOVERY REQUESTS

I. Instructions

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

2. If Petitioner finds the meaning of any term in any RFP or Interrogatory unclear, Petitioner should assume a reasonable meaning, state what the assumed meaning is, and produce documents and things or provide an answer on the basis of that assumed meaning.

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

II. Definitions

1. “Tapestry®” shall mean the Tapestry® Biointegrative Implant.
2. “Tapestry® RC” shall mean the Tapestry® RC Biointegrative Implant System.
3. “ActivBraid®” shall mean the ActivBraid® Collagen Co-Braid.

III. Requests for Production

1. Documents sufficient to show, on an annual basis since January 1, 2019, Petitioner's relative market share of the U.S. market for implants for tendon or ligament repair based on sales of the Tapestry® or the Tapestry® RC.

2. Documents sufficient to show, on an annual basis since January 1, 2019, Petitioner's relative market share of the U.S. market for sutures based on sales of the ActivBraid®.

3. Documents sufficient to show the reasons why healthcare providers in the United States purchase the Tapestry® or the Tapestry® RC.

4. Documents sufficient to show the reasons why healthcare providers in the United States purchase the ActivBraid®.

IV. Interrogatories

1. Identify, on a quarterly basis since January 1, 2019, the unit sales and total revenues for the Tapestry®.

2. Identify, on a quarterly basis since January 1, 2019, the unit sales and total revenues for the Tapestry® RC.

3. Identify, on a quarterly basis since January 1, 2019, the unit sales and total revenues for the ActivBraid®.

Dated: September 2, 2025

Respectfully submitted,

Electronic signature: /George B. Davis/

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Certification of Service

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on September 2, 2025, a copy of the foregoing document was served by electronic mail upon the following counsel of record for Petitioner:

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