Chris von Gunten

From: Tatum, Christian <ctatum@mwe.com>
Sent: Tuesday, July 1, 2025 6:14 PM
To: Aaron Pirouznia
Cc: Stratasys-MWE; ddacus@dacusfirm.com; Andrea L. Fair; Claire A. Henry; Shelly Prim; FR Service-Bambu Lab/Stratasys; Greg Love
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Counsel,

As to the inventor documents, we understand that MakerBot has completed its search and has made a production containing such documents today.

As to your other two questions:

1. As discussed during the meet and confer, Stratasys is not seeking lost profits in this case.
2. During the meet and confer we discussed your position that Stratasys has a right of control over MakerBot's documents. As we have informed you, Stratasys does not have a right of control over MakerBot's documents. The provision of the MakerBot patent assignment you referenced does not give Stratasys the right of control over MakerBot's documents simply because patents formerly owned by MakerBot are asserted in this action. MakerBot agrees with this assessment. While the provision provides ownership rights to Stratasys regarding the "Inventions" covered by that agreement, we understand that the documents related to those inventions (e.g., prosecution files, invention disclosures / conception documents, lab notebooks, inventor documents, etc.) were produced by MakerBot today. Any further requests for documents from MakerBot must be made consistent with third-party subpoena practice.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, June 27, 2025 9:47 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>; Greg Love <greg@stecklerlaw.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Counsel,

While we await your response on the inventor document issue, I wanted to revisit your commitments from the June 19 meet and confer. As memorialized below, you stated that you would give us several positions in writing. When asked for the timeframe that this would occur, Mr. Meek said "days, not weeks."

You have provided Stratasys's position on the open source discovery dispute, but we are still awaiting correspondence showing:

1. that Stratasys is no longer reserving the right to seek lost profits; and
2. whether or not Stratasys agrees that it has possession, custody, or control of UltiMaker's invention documents.

Please let us know when we can expect these statements.

Thank you,
Aaron

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Tuesday, June 24, 2025 9:56 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>; Greg Love <greg@stecklerlaw.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Counsel,

We've been focusing on the open source and product document issues in the most recent correspondence and meet and confers, but I wanted to follow up on the inventor document issue, which we've also repeatedly raised over the past seven months.

On June 2, you mentioned that "Stratasys's document collection vendor has collected over a terabyte of documents, and the review process is underway. To the extent any additional responsive and non-protected documents are uncovered by this large-scale search, Stratasys will produce those documents."

Other than the inventor declaration from the IPR, we are not aware of any inventor documents that Stratasys has produced. If we're overlooking any, please let us know. If not, please provide an update on your efforts.

Thank you,
Aaron

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, June 20, 2025 9:32 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>; Greg Love <greg@stecklerlaw.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Counsel,

Thank you for meeting and conferring with us yesterday, June 19, 2025, regarding Bambu's outstanding requests for discovery related to Stratasys's systems and products and Stratasys's open-source activities. I write to memorialize our discussion.

Production on June 18, 2025
We began by addressing Stratasys's document production served in the evening on June 18, which we had not yet had an opportunity to review given the federal holiday. You represented that this production included (1) documents related to Stratasys's 360mc/400mc printers and certain products from the early 2000s, and (2) declarations from the '713 Patent IPR.

Stratasys's Systems and Products
We then turned to the four categories of systems and products that the parties have long discussed.

Stratasys Systems from Invalidity Contentions: We reiterated that our requests for these systems cover two categories: (1) technical documentation and (2) source code.

On the technical documentation, we requested a date certain by which Stratasys would complete its production of responsive documents. You were unable to provide a date.

On the issue of source code, we reiterated our request for the source code for the Stratasys products identified in our invalidity contentions, limited to the prior art versions that existed before the purported priority date of each corresponding patent. In other words, we weren't requesting every piece of source code available for a given prior art product. We also reiterated that this request is reciprocal in scope to Stratasys's own requests for Bambu's source code, which Bambu provided months ago. You were unable to commit to making this code available.

Stratasys's Marked Products that Practice or Previously Practiced the Asserted Patents: We explained that Stratasys has produced six product labels and asked for an update on Bambu's request for documents concerning these marked products. We reiterated their relevance to numerous issues in this case, including damages (lost profits, reasonable royalties, and the *Georgia-Pacific* factors), inventorship, marking, noninfringement (e.g., open source licensing) and invalidity (e.g., invalidating sales). Stratasys repeated its prior argument that Bambu's requests are too broad. Finally, you stated for the first time that lost profits will not be at issue in this case and stated that you will provide this position in writing.

Stratasys's Unmarked Products that Practice or Previously Practiced the Asserted Patents: Here, we explained that Stratasys first demanded that Bambu serve an *Artic Cat* letter before producing any documents, which Bambu has done. Stratasys reiterated its position that this discovery is unnecessary if the parties agree that a particular product is practicing. We explained that this information is relevant for the same reasons articulated for the marked products. You were unable to commit to producing documents for Stratasys's marked and unmarked practicing products.

Stratasys's Planned Products that Practice or Previously Practiced the Asserted Patents: You represented that after a recent internal inquiry, Stratasys is not aware of any planned products that practice the Asserted Patents and that you will provide this position in writing.

Stratasys's Open Source Activities
We addressed the requests regarding Stratasys's open-source activities, which we have now discussed on several occasions. We raised our detailed letter of June 16, 2025, which provided the information requested by Stratasys and further explanation of the open source defense. You stated that you were still digesting our letter and required additional time. You agreed to provide a substantive response to the letter by Wednesday, June 26, 2025. We asked, and you confirmed, that if Stratasys's position on these issues does not change by June 26, then this discussion, on June 19, can be considered the final meet and confer on this topic.

MakerBot Documents
Finally, we revisited Stratasys's refusal to produce documents from MakerBot. You stated that Stratasys's position remains that it does not have possession, custody, or control over MakerBot documents. You also stated that MakerBot

is aligned with this position and that you would provide this position on behalf of both Stratasys and MakerBot in writing. We reiterated our position that Stratasys's contractual right and ability to request and receive documents from MakerBot means that Stratasys has control of the documents. You reiterated your position that the contract only applies to "invention" documents but were unable to say whether or not this means Stratasys has possession, custody, or control of those documents. You also did not dispute that Stratasys could request and receive these documents but instead stated your position that third-party discovery was the appropriate means. We reiterated that Stratasys's approach of directing Bambu to serve a subpoena on MakerBot, only for MakerBot to then object that the requests are overly burdensome for a third party, is impeding discovery. As we stated, and as you know, MakerBot has yet to produce a single document or provide a date certain by which production will begin. Given our disagreement, the parties are at an impasse on this issue.

Best regards,
Aaron

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Monday, June 16, 2025 1:58 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>; Greg Love <greg@stecklerlaw.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

In addition to the Stratasys product issues identified below, we'd also like to discuss the MakerBot document issues on Thursday's meet and confer. These issues are discussed in your June 2 email and my May 23 email below. These issues are also related to the product document dispute, as (1) Bambu's invalidity contentions identified MakerBot products, (2) neither Stratasys nor MakerBot has produced any documents regarding these products, and (3) Bambu contends that Stratasys has possession, custody, or control of MakerBot's and UltiMaker's documents.

Thanks,
Aaron

From: Aaron Pirouznia
Sent: Thursday, June 12, 2025 4:17 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>; Greg Love <greg@stecklerlaw.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

Carl and Greg are available on June 19 at 8 am. I'll circulate an invite.

Best,
Aaron

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Thursday, June 12, 2025 10:36 AM
To: Tatum, Christian <ctatum@mwe.com>

Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Thanks, Christian. We'll get back to you on which time works.

Obviously I disagree with your statements below, but please tell me, which of the "many categories" were "raised for the first time in [my] June 3rd email"? I've copied them below for your convenience.

1. Stratasys Systems from Invalidity Contentions
2. Stratasys's Marked Products that Practice or Previously Practiced the Asserted Patents
3. Stratasys's Unmarked Products that Practice or Previously Practiced the Asserted Patents
4. Stratasys's Planned Products that Practice or Previously Practiced the Asserted Patents

Is it the invalidity contention products that we first raised on January 30?

Or the practicing products that we raised in document category 55 in our November 13, 2024 letter?

Or maybe the planned products, which also fall under category 55 as well as my April 25 email below?

Thanks,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.

T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Thursday, June 12, 2025 10:12 AM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

The fact that you cannot explain the relevance of the vast majority of these materials—many categories of which you raised for the first time in your June 3rd email—evidences that Defendants do not have a basis for the overwhelmingly broad and unduly burdensome discovery requested. The parties cannot be at an impasse when your requests are ever morphing and the relevance of the requested materials to disputed issues in the case remains unarticulated. Nothing in our positions have been inconsistent. We are available at the following times for you to explain the bases supporting your requests:

1. June 17th: 8am-9:30am;
2. June 19th: 8am-10am

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Tuesday, June 10, 2025 4:13 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Christian,

We disagree that "Bambu still hasn't explained the relevance of its requests." The below email chain establishes that we have, and besides the written correspondence, we have also repeatedly explained the relevance of our requests in several meet and confers.

The facts are simple:

1. This is a competitor case.
2. The DCO required Stratasys to produce documents relevant to the claims and defenses on November 29, 2024.
3. Bambu's invalidity contentions identified the relevant prior art products on January 30, 2025.
4. Over 6 months have passed since the Additional Disclosure deadline, and **Stratasys has not produced a single document regarding any of its products**.
5. Despite multiple requests, Stratasys will not provide a date certain by which these documents will be produced.

Your email below establishes that the parties are at an impasse regarding if and when Stratasys must produce documents regarding its products. Indeed, after stating that an *Artic Cat* letter is a prerequisite into discovery into Stratasys's practicing products, Stratasys now states that "if, upon review of your identification, Stratasys does not dispute your assertion, then there is no need to produce any of the requested documents." It is abundantly clear that no matter what justification Bambu provides, Stratasys will continue to delay and find excuses not to meet its obligations under the Discovery Order.

We intend to raise this issue with the Court. Please provide your availability to meet and confer with lead and local present.

Thank you,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Tuesday, June 10, 2025 10:48 AM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair

<andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

We are working on availability for mornings starting the 17th and will follow up once we have locked in times. That said, a lead-and-local meet and confer seems premature—Bambu still hasn't explained the relevance of its requests. As noted below, you need to clarify exactly what you're seeking and why. Until then, a lead and local meet and confer is likely going to be a waste of time and resources. While you suggest Defendants "merely asked for confirmation on four bullet points," there has been no meaningful explanation of what you're asking for. Plaintiff is left guessing at both the purpose and scope of the requests. We have reproduced your positions below and added our responses in red to help frame the issues, but our objections—outlined in Mr. Meek's May 28 letter and referenced in the correspondence below—still stand. If you believe there is a legitimate basis for any of these requests, please articulate it and we remain open to hearing it.

1. Stratasys Systems from Invalidity Contentions
    1. You state that Stratasys's "targeted search efforts . . . identified potentially responsive documents" that "are currently being processed for review."
    2. **We understand that within the next two weeks Stratasys will produce technical documents, design documents, source code, and documents evidencing the first sale of the prior art products.**
        1. **Stratasys response:** We have not committed to producing documents within the next two weeks. As our prior email explained, we are engaged in searching for information related to this topic. We may be able to get out the technical documents identified from the targeted search mentioned in my email below in that time frame, but additional search and review efforts are also underway, and I do not anticipate those being complete within two weeks. As to the source code, unless we are mistaken, this is the first time you have raised any request for "source code" related to the systems identified in your invalidity contentions. Please identify where in your contentions you identify such source code.
2. Stratasys's Marked Products that Practice or Previously Practiced the Asserted Patents
    1. Stratasys's recent Marking Document production reveals that Stratasys and its counsel are aware of at least some products that practice or previously practiced the Asserted Patents.
    2. Mr. Meek's letter of May 28 suggests that Stratasys will not provide discovery into these products because they are not unmarked products that have been identified under the *Arctic Cat* framework.
    3. **We understand that Stratasys refuses to search for and produce documents and source code for all products that it knows practice or previously practiced at least one Asserted Patent.**
        1. **Stratasys response:** Based on the various communications on this issue, we understand that Defendants have raised two bases for seeking this information: (1) that Plaintiff has not disclaimed a lost profits theory; and (2) that possibly one of these products may have been sold prior to the priority date of the practiced Asserted Patent. As to item (1), please explain which *Panduit* factor the requested documents relate to and how. As to item (2), a request for all technical documents, design documents, source code, and financial information for the products is a wildly disproportionate (and largely irrelevant) request for such a speculative assertion. Notably, the request is not in any way limited in time or scope. Do you have a Rule 11 basis to believe that any such products were sold prior to the priority date of the relevant Asserted Patent? If so, please provide a list of such products, and we can find a much more reasonable way to address your speculation than the dramatically overbroad and unduly burdensome discovery sought.
3. Stratasys's Unmarked Products that Practice or Previously Practiced the Asserted Patents
    1. **We understand that once Bambu identifies unmarked products that practice the Asserted Patents under the *Arctic Cat* framework, Stratasys will search for and produce technical documents, design documents, source code, and financial data regarding these products.**

1. **Stratasys response:** We need to see what Defendants put forward regarding its *Arctic Cat* identification before we are able to make any commitments. For instance, if, upon review of your identification, Stratasys does not dispute your assertion, then there is no need to produce any of the requested documents. We expect Defendants to make any marking-related identification only after establishing a Rule 11 basis for asserting that Stratasys sold an unmarked product that practiced an asserted claim. Defendants are not entitled to make such an allegation based on speculation or inference. Stratasys intends to take discovery into the basis for any such identification. As you are aware, once such an allegation is made, Stratasys will be required to expend significant resources to rebut it. If Defendants make this assertion without a proper Rule 11 basis and cause Stratasys to incur unnecessary fees and costs, Stratasys will seek all appropriate relief from the Court. Additionally, as noted above, please explain your bases for seeking "source code" and "financial data" regarding these products.

4. Stratasys's Planned Products that Practice or Previously Practiced the Asserted Patents
    1. **We understand that that Stratasys refuses to search for and produce documents and source code for its planned products that practice the Asserted Patents.**
        1. **Stratasys response:** Based on the various communications on this issue, we understand that Defendants have raised two bases for seeking this information: (1) that Plaintiff has not disclaimed a lost profits theory; and (2) that possibly one of these products may have been disclosed prior to the priority date of the practiced Asserted Patent. As to item (1), please explain which *Panduit* factor this discovery relates to and how. As to item (2), a request for all technical documents, design documents, source code, and financial information for the planned products is a wildly disproportionate (and largely irrelevant) request for such a speculative assertion. Additionally, as we have previously explained, whether a product practices the Asserted Patents is a determination requiring expert opinion. Do you have a Rule 11 basis to believe that any such "planned" products were publicly disclosed prior to the priority date of the relevant Asserted Patent? Absent further explanation as to how the requested documents are possibly relevant, this request appears to be nothing but a fishing expedition designed to increase the burden on Stratasys.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Monday, June 9, 2025 8:59 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Christian,

Carl will be in China, so something in the morning US time should work. Please let us know what mornings after the 16th your side will be available.

Also, I sent the below email last Tuesday and merely asked for confirmation on four bullet points. Please provide Stratasys's response by tomorrow, which will mark one week.

Thanks,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Friday, June 6, 2025 7:46 PM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

As to the availability for a meet and confer, we have conflicts during Friday June 13th-Monday June 16th. If you can get me your side's availability after that, I can find some workable times.

Regarding the questions in your Tuesday email below, we are still running down a couple items, but we expect to have the requested positions to you by early next week.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Thursday, June 5, 2025 11:09 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Hi Christian,

Thanks for confirming on the call earlier today that you plan to respond by tomorrow. When you do, can you please also include availability of lead and local to meet and confer between June 13-16? Our lead counsel has back-to-back international travels outside of those dates, so we'd like to go ahead and get a time nailed down in case we need it.

Thanks,
Aaron

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Tuesday, June 3, 2025 10:40 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

Thank you for your email. I will follow up later on the other topics, but I first wanted to respond regarding the topics related to Stratasys's systems and products.

We have reviewed your response below and Mr. Meek's letter of May 28, and we are left uncertain regarding exactly what Stratasys agrees to search for and produce. To ensure the parties are on the same page, I've summarized our understanding of Stratasys's positions below. By Friday June 6, please confirm this understanding is correct or clarify any misunderstandings we may have.

1. Stratasys Systems from Invalidity Contentions
    a. You state that Stratasys's "targeted search efforts . . . identified potentially responsive documents" that "are currently being processed for review."
    b. **We understand that within the next two weeks Stratasys will produce technical documents, design documents, source code, and documents evidencing the first sale of the prior art products.**
2. Stratasys's Marked Products that Practice or Previously Practiced the Asserted Patents
    a. Stratasys's recent Marking Document production reveals that Stratasys and its counsel are aware of at least some products that practice or previously practiced the Asserted Patents.
    b. Mr. Meek's letter of May 28 suggests that Stratasys will not provide discovery into these products because they are not unmarked products that have been identified under the *Artic Cat* framework.
    c. **We understand that Stratasys refuses to search for and produce documents and source code for all products that it knows practice or previously practiced at least one Asserted Patent.**
3. Stratasys's Unmarked Products that Practice or Previously Practiced the Asserted Patents
    a. **We understand that once Bambu identifies unmarked products that practice the Asserted Patents under the *Artic Cat* framework, Stratasys will search for and produce technical documents, design documents, source code, and financial data regarding these products.**
4. Stratasys's Planned Products that Practice or Previously Practiced the Asserted Patents
    a. **We understand that that Stratasys refuses to search for and produce documents and source code for its planned products that practice the Asserted Patents.**

Thank you,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.

T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Monday, June 2, 2025 10:50 AM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

Please see below for our responses to each of your topics.

Upcoming Productions + Marking Documents + Stratasys Systems from Invalidity Contentions
You request an update on Stratasys's document search efforts and productions.

In addition to the targeted searching that Stratasys has conducted and continues to conduct in response to Defendants' inquiries, Stratasys has also been working with a third-party document collection vendor to collect over a terabyte of data. As you can understand, collecting this large amount of data, and reviewing the same, takes considerable time.

As you have seen, on Friday we served a production containing additional license agreements. As previously discussed, we expect to produce even more license agreements in the coming weeks. Regarding marking documents, we continue to search for and identify additional documents related to Stratasys's marking of products. We expect that we will have more documents to produce as a result of those search efforts. Stratasys has also engaged in targeted search efforts related to the Stratasys systems identified in your invalidity contentions and has identified potentially responsive documents. Those documents have been collected by the third-party vendor and are currently being processed for review.

Please be advised that Stratasys has made, and is making, these productions despite the fact that Defendants have failed to meet their technical document and source code production obligations under P.R. 3-4(a). Defendants' production of technical documents and source code regarding the accused products was due over four months ago, and Defendants' lethargic discovery efforts are causing significant prejudice to Stratasys. We will follow up regarding these deficiencies separately, but rest assured that Defendants' efforts to shield their incomplete and deficient discovery efforts will not go unnoticed and will be brought to the Court's attention if not remedied soon.

Stratasys's Products or Planned Products that Practice or Previously Practiced the Asserted Patents
On this issue, I will direct you to the letter from Kevin Meek served on May 28th, which addressed similar positions raised by Defendants in a letter from Carl Bruce. The May 28th correspondence provided times for a meet and confer on this topic. Please let me know if there is an issue here that is distinct from that covered by the aforementioned letters; otherwise, for clarity of communication, we think it best to have one line of dialogue on this topic. That being said, and as noted in the May 28th letter, we welcome Defendants meeting their initial burden under *Arctic Cat*.

Inventor Documents
You request that we "clarify whether [we] have identified any 'protected' inventor documents, and if so, please provide an update on when [Defendants] can expect to receive a privilege log." You also request an update on Stratasys's search and collections efforts regarding these documents.

For the category of documents you have denoted as "inventor documents" (i.e., documents by the named inventors relating to the conception and reduction to practice of the Asserted Patents), we can confirm that we have not identified any "protected" inventor documents at this time. Per the Court's Docket Control Order, privilege logs are to be exchanged on October 8, 2025. (Dkt. No. 34 at 5). As discussed above, Stratasys's document collection vendor has

collected over a terabyte of documents, and the review process is underway. To the extent any additional responsive and non-protected documents are uncovered by this large-scale search, Stratasys will produce those documents.

MakerBot Documents

It is irrelevant that McDermott represents both Stratasys and MakerBot. That does not make MakerBot a party to this case, nor does it allow Defendants to circumvent the requirements attendant to third-party discovery. McDermott is not "play[ing] both sides of the fence" by asking you to comply with the standard rules governing third-party discovery. McDermott's representation of MakerBot does not absolve BambuLab of the rigors of FRCP 45.

We understand that MakerBot has already agreed to perform a search regarding named inventor materials (item #2) in response to your subpoena. *See* (May 16th email from A. Kapadia to A. Pirouznia; RE: Stratasys, Inc. v. Shenzhen Tuozhu Technology Co. Ltd. et al / E.D. Tex. 2:24-cv-00644-JRG). As we previously explained, the provision you referenced relates to "Inventions" and is not so expansive as to provide Stratasys with the ability to request from Makerbot the broad scope of documents you seek. With respect to your requests for Stratasys documents, we separately address your open source requests below (relates to item #3), and we have produced a full copy of the merger agreement, including a duplicative native version this past week (relates to item #4).

If there are any Stratasys documents you seek that overlap in subject matter with your requests to MakerBot, please specify those in writing so that we can object/respond accordingly. As always, to the extent any responsive, non-protected documents are identified as being in Stratasys's possession, custody, or control, those documents will be produced by Stratasys.

Open Source Requests

We agree that it is difficult for us to understand Defendants' "open source" license defense. That is why we have repeatedly sought explanation from Defendants as to the contours of that defense. We have received no sufficient clarification.

From our discussions, we understand that Defendants are attempting to assert a license defense. In fact, that is what Defendants put in their supplemental disclosures. *See* Defendants' First Supplemental Initial and Additional Disclosures at 3 ("Stratasys's claims for patent infringement are precluded in whole or in part by express and/or implied license(s) and/or agreement(s) regarding the Asserted Patents and by the doctrines of full compensation, license, exhaustion, and/or first sale."). However, your responses and requests have been incongruent with such a defense.

With respect to item (1) (which asked Defendants to identify the supposedly accused "open-source" functionality), you state that "Stratasys may have agreed to license the Asserted Patents by way of its contributions to open source code or its use of open source code, irrespective of whether it presently accuses 'open-source functionality.'" But an agreement that is unrelated to the accused products would not support Defendants' "open source" license defense. A license granted by Stratasys in relation to some open source software is only relevant if Defendants' accused products use that licensed open source software to infringe. *See, e.g.*, *Winbond Elecs. Corp. v. Int'l Trade Comm'n*, 262 F.3d 1363, 1374 (Fed. Cir.), *opinion corrected,* 275 F.3d 1344 (Fed. Cir. 2001) ("An implied license finding requires a nexus between the patentee's purported waiver and the infringing action."); *Stickle v. Heublein, Inc.,* 716 F.2d 1550, 1559 (Fed. Cir. 1983) (affirming a determination of no implied license because the act of infringement was distinct from the conduct of the patentee); *Bowman v. Monsanto Co.*, 569 U.S. 278, 284 (2013) ("[T]he doctrine [of exhaustion] restricts a patentee's rights only as to the 'particular article' sold; it leaves untouched the patentee's ability to prevent a buyer from making new copies of the patented item.").

Indeed, Defendants appeared to recognize as much in their supplemental disclosures, which specifically stated: "**to the extent Stratasys accuses functionality present in open-source software**, such functionality may be licensed pursuant to open-source licenses." *Id.* (emphasis added). If it is Defendants' position that a license granted by Stratasys unrelated to Defendants or the accused products could support a license defense, please provide us with case law support. We await

any further clarification you can provide regarding this "open source" defense. Until then, there is nothing more that Stratasys can provide or will provide Defendants with regard to its request for open source discovery.

Regards,
Christian

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From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, May 30, 2025 9:16 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Christian,

It's been over a week since my email, and we have not heard back from Stratasys. Please provide responses to each of the requests my email contained by Wednesday, June 4.

We are in receipt of Stratasys's production from today, which contained the native document we requested as well as 5 license agreements. Including this production, Stratasys has produced only 13 documents over the past 5 weeks. Notably, Stratasys has still not produced any documents regarding any of its products—not even the prior art products Bambu identified in its invalidity contentions in January, nor the products that Stratasys itself identified as practicing the Asserted Patents. By Wednesday, please provide a date certain by which we will receive these documents. We have been patient long enough, and Stratasys's delays are prejudicing the development of Bambu's defenses.

Best regards,
Aaron

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From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, May 23, 2025 3:55 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

Thank you for the update. Please see below for responses to the various topics we've been discussing.

Marking Documents
We are in receipt of the "production of marking documents" you reference below. This 6 document production consisted of labels for Stratasys's products that state the product is "Protected by one or more" patents, including certain Asserted Patents. Please let us know if we can expect more marking documents or if these 6 product labels are the entirety of Stratasys's marking efforts for the Asserted Patents.

Stratasys Prior Art Products from Bambu's Invalidity Contentions
As you admit, we identified these products in our invalidity contentions on January 30, 2025. As such, it was improper for Stratasys to wait until we "raised this complaint for the first time in []our April 11th email" before it began its search. Please provide an update on Stratasys's efforts of searching for and collecting responsive documents.

Stratasys's Products or Planned Products that Practice or Previously Practiced the Asserted Patents
At the outset, we disagree with your apparent assertion that only Stratasys's practicing products that were not marked are subject to discovery. Even if Stratasys sufficiently marked its practicing products, those products are still relevant to the claims and defenses at issue in this case. For example, a sale of a practicing product prior to the priority date of the practiced Asserted Patent would be relevant to the patent's validity. And as we previously explained, Stratasys's practicing products are also relevant to damages. Please confirm that Stratasys will begin searching for and producing documents and source code for at least those practicing products that are identified in Stratasys's May 19, 2025 production.

Bambu is in the process of identifying other products that it reasonably believes practice at least one Asserted Patent and will provide a list of those in the near future. This process has been hampered by Stratasys's refusal to provide any technical documents on its practicing products until such an identification is made. This is especially troubling because Stratasys's recent Marking Document production reveals that Stratasys and its counsel are aware of at least some products that Practice or Previously Practiced the Asserted Patents. Please confirm that Stratasys will begin searching for and producing documents and source code for all products that it knows practice or previously practiced at least one Asserted Patent.

Finally, we disagree with your assertion that Stratasys's "planned products" have no relevance to this dispute. If Stratasys developed a practicing product that ultimately did not make it to market (i.e., a "planned product"), that product would still be relevant the claims and defenses at issue in this case. For example, a disclosure of such planned product before the priority date of the Asserted Patents would be relevant to validity. And Stratasys's plans regarding the sales of such planned products would also be relevant to damages. Please confirm that Stratasys will begin search for and producing documents regarding any planned products that it knows practice or previously practiced at least one Asserted Patent.

Inventor Documents
You state that you "are not aware of any responsive, non-protected documents in the possession, custody, or control of Stratasys." Please clarify whether you have identified any "protected" inventor documents, and if so, please provide an update on when we can expect to receive a privilege log. Please also provide an update on your "search and collection with respect to the inventors [] (i.e., conception and reduction to practice)."

MakerBot Documents
Your law firm represents both Stratasys and MakerBot. And while you tell us our requests are "an end-run around third-party subpoena practice," your colleague tells us that MakerBot demands that any documents in possession, custody, or control of Stratasys must be received from Stratasys so that a third-party is not unnecessarily burdened. Nowhere below do you represent that the requested MakerBot documents are not in Stratasys's possession, custody, or

control. As such, you have an obligation under the Federal Rules to provide these documents. And to the extent your law firm continues to play both sides of the fence, we will be forced to raise this dispute with the Court.

Furthermore, we disagree with your conclusion regarding inventor files, notebooks, and documents relevant to the conception or reduction to practice of the alleged inventions. You state that "Stratasys has not alleged earlier conception and reduction to practice for any of patents to which MakerBot was the original assignee," so "these materials have no relevance to this dispute." This is demonstrably false. Merely because Stratasys does not allege an earlier conception date does not mean that the facts and circumstances surrounding the conception of the alleged inventions are irrelevant. Indeed, as explained on our prior meet and confers, these documents are relevant to at least the issues of inventorship, damages, and the proper interpretation of the claim terms.

Upcoming Productions

You state that "Stratasys is currently conducting comprehensive document searches." Yet in the past month, Stratasys has only made one production, containing only 6 documents. Please provide an update on Stratasys's "comprehensive" search efforts.

Open Source Requests

You appear to misunderstand the defenses at issue. Specifically, you've asked us to "(1) identify the supposedly accused 'open-source' functionality, (2) identify the relevant open-source license, and (3) identify the contributors to that open-source functionality based on the publicly available information."

Regarding (1), Stratasys may have agreed to license the Asserted Patents by way of its contributions to open source code or its use of open source code, irrespective of whether it presently accuses "open-source functionality."

Regarding (2) and (3), we will circle back with (a) a list of relevant open-source licenses, (b) a list of relevant open-source code bases, and (c) a list of open source contributors to these code-bases that relate to a relevant party. We will provide these lists as a courtesy to help Stratasys with its initial searching, but we do not agree that Statasys's discovery obligations are limited to the examples we are currently aware of.

Thank you,
Aaron

Aaron P. Pirouznia
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From: Tatum, Christian <ctatum@mwe.com>
Sent: Thursday, May 22, 2025 8:21 AM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

I am writing to provide an update regarding the production of marking documents and the license agreements. As you saw, a production of marking documents was made on Monday. Stratasys expects its rolling productions on this matter to continue.

Regarding the remaining license agreements that have not already been produced, a subset of these remaining agreements is currently queued for production. We expect those agreements to be produced within the next week. We are providing notice to third parties for around another half-dozen agreements. At least one agreement requires consent, and, in general, we expect the notice periods for these licenses to conclude in the next few weeks. To be clear, none of the agreements in this final category concern any of the Asserted Patents in this case.

Regards,
Christian

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From: Tatum, Christian
Sent: Monday, May 19, 2025 12:17 PM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

We expect the document production to be sent out today. Some delays in processing pushed the date of production past Friday. We are also reviewing your questions below regarding licenses subject to notice provisions. We expect to follow up with a summary response soon.

Regards,
Christian

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From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Monday, May 19, 2025 11:09 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Christian,

Following up on this. We did not receive a production last week.

Best regards,
Aaron

From: Aaron Pirouznia
Sent: Friday, May 16, 2025 11:10 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

We are in receipt of your email and will provide a response on each of the points below. For now, however, we kindly request an update on the "production relating to patent marking documents" that you said would be made this week. Do you intend to make that production today?

Please also let us know where you stand on production of the licenses subject notice provisions that you mention below. How many licenses are subject to notice provisions? Do any of these licenses require consent to produce, or is Stratasys simply waiting for a notice period to run? If the latter, when will the notice periods run?

Thanks,
Aaron

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From: Tatum, Christian <ctatum@mwe.com>
Sent: Friday, May 9, 2025 4:27 PM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

We write in response to your April 25th email. We disagree with your characterization of the April 17th meet and confer. As requested, we provided details on our search efforts, including giving you specific examples. As we explained during the meet and confer, Stratasys, like most companies, does not organize its business and records in the same format that an attorney may wish to seek them. We also explained to you that a document production was forthcoming (which was served on April 21st) and that further document productions are in the works, consistent with Stratasys's plan for rolling document production. Notably, **you asked no follow-up questions**. Turning to each of the categories of documents you identified, see our responses below:

1. Stratasys products that Defendants have identified as prior art in invalidity contentions;
    - You raised this complaint for the first time in your April 11th email. Stratasys is in the process of searching for and collecting responsive documents, to the extent they are in Stratasys's possession, custody, or control.

2. any Stratasys products or planned products that practice or previously practiced the asserted patents;
    - Discovery into Stratasys's "planned products" has no relevance to this dispute—and you certainly have articulated none—and amounts to nothing but an improper fishing expedition. With respect to existing products that practice the inventions of the asserted patents, you have failed to identify any such products and show that they are not marked, and thus have not satisfied your initial burden under *Arctic Cat*. Stratasys is not going to undergo an investigation requiring expert opinion for every single product to determine which products "practice or previously practiced the asserted patents." If you think that a Stratasys product practices any claims of the asserted patents and has not been marked, then please meet your burden under *Arctic Cat* to make the requisite identification.

3. the named inventor's documents;
    - We specifically addressed this with you on the meet and confer. We discussed that we looked into white papers, for example, and determined that they are not authored by the inventors. Your email ignores this. While our search and collection with respect to the inventors continues (i.e., conception and reduction to practice), we are not aware of any responsive, non-protected documents in the possession, custody, or control of Stratasys.

4. the documents relating to the MakerBot/UltiMaker deal;
    - As you recognize, we have produced these documents, including a plethora of supporting documentation. You have failed to articulate any deficiency with respect to this production.

5. licenses and related correspondence.
    - As you recognize, we have produced these documents. As we also explained, additional licenses are subject to notice provisions and are in the pipeline for production after Stratasys's obligations under those provisions have been satisfied. To the extent you are seeking *all* Stratasys licenses, you have failed to articulate why they would be relevant. Finally, to the extent your inclusion of "correspondence" is intended to include emails related to these licenses, that is the province of email discovery and governed by the limitations of the E-Discovery Order. As with category (4), you have failed to articulate any deficiency with respect to Stratasys's production of relevant licenses.

<u>Regarding your request for "MakerBot's documents"</u>: you seek documents from a third-party to this litigation, not Stratasys. The appropriate way to discover these documents is through a third-party subpoena, which Stratasys understands you are currently pursuing. The provision you reference below relates to "Inventions" and is not so expansive as to provide Stratasys with the ability to request from Makerbot the broad scope of documents you seek. Please see below for responses to each of your categories related to "MakerBot's documents":

1. Documents that evidence the operation, capabilities, and public availability of the prior art, especially systems identified in Bambu's invalidity contentions;
    - Your request is an end-run around third-party subpoena practice. If you want "MakerBot's documents" responsive to this request, you need to proceed with third-party discovery through the MakerBot subpoena you have already served.

2. Named inventor files, notebooks, and documents relevant to the conception or reduction to practice of the alleged inventions;
    - Stratasys has not alleged earlier conception and reduction to practice for any of patents to which MakerBot was the original assignee. As such, these materials have no relevance to this dispute. We also understand that you already have a request out to MakerBot on this same subject. *See, e.g.*, MakerBot subpoena at RFP #2.

3. MakerBot activities and policies related to open-source initiatives; and

- Your request is an end-run around third-party subpoena practice. If you want "MakerBot's documents" responsive to this request, you need to proceed with third-party discovery through the MakerBot subpoena you have already served.

4. Any other documents related to MakerBot/UltiMaker corporate reorganization, including those that inform any treatment of patent rights or valuation.
    - Your request is an end-run around third-party subpoena practice. If you want "MakerBot's documents" responsive to this request, you need to proceed with third-party discovery through the MakerBot subpoena you have already served.

Regarding upcoming productions: As explained above, we expect a further production of licenses subject to notice provisions. We also expect a production relating to patent marking documents to be made next week. In addition, as has been the case, as responsive and non-protected documents are identified they will be included in the rolling production. Like Defendants, Stratasys is currently conducting comprehensive document searches. As Defendants recognized in their opposition to Stratasys's motion to transfer, "Stratasys is [] not the accused infringer and is less likely to have the larger volume of relevant evidence in its possession." *BambuLab USA, Inc. et al v. Stratasys, Inc.*, No. 1:24-cv-01511-ADA, Dkt. No. 27 at 11 (W.D. Tex.). The same cannot be said for Defendants who have shirked their obligations and have provided virtually no internal technical documentation for the accused products, despite the Court's deadline to do so ***over three months ago***.

Regarding your open-source request: We explained in our April 15th email that Defendants' supplemental disclosure regarding its "open-source defense" is "premised on the unsubstantiated position that 'to the extent Stratasys accuses functionality present in open-source software, such functionality may be licensed pursuant to open-source licenses.'" We asked you to "please identify the functionality and corresponding open-source software that is implicated" with respect to Bambu's accused products. You refused to do so. Your "open source" requests are far too broad—as you are aware, contributions to open-source software do not by themselves provide for the grant of a patent license. What you instead appear to be referring to are a limited subset of "copyleft" open-source licenses, such as the singular license you identified in your supplemental disclosures (i.e., AGPL). In addition to being overbroad, your requests are also vague to the point of making a response practically impossible. As we asked you on our meet and confer, what contributions are relevant? Is the contribution of an arithmetic function to an open-source codebase relevant? What about the contribution of a comment to that same codebase? You appeared to indicate that these would not be relevant, but you were unable to articulate any workable bounds for your requests. Though we have raised the overbreadth and vague nature of your requests, you have failed to articulate the actual contours of your theory or any practical bounds to the search and production you are seeking.

If Defendants believe that "Stratasys accuses functionality present in open-source software" and that "such functionality may be licensed pursuant to open-source licenses," then you need to: (1) identify the supposedly accused "open-source" functionality, (2) identify the relevant open-source license, and (3) identify the contributors to that open-source functionality based on the publicly available information. At that point, Stratasys may be able to provide you with responsive information related to these "open source" requests. Until then, and as we explained in our April 15th email, Bambu's quest for expansive discovery into all aspects of Stratasys's (and its employees') contributions to open-source software remains little more than an impermissibly burdensome fishing expedition bordering on harassment.

Regards,
Christian

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From: Tatum, Christian
Sent: Friday, May 2, 2025 4:49 PM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

We have received your email. You can expect a response next week.

Regards,
Christian

CHRISTIAN TATUM
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From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, April 25, 2025 1:58 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

[redacted]

Christian,

I write to follow up on my April 16 email regarding Stratasys's deficient document production. As further explained below, Stratasys's production remains deficient, prejudicing Bambu. Indeed, Stratasys has yet to produce any documents at all on the prior art Stratasys products that Bambu identified with specificity in its January 30, 2025 invalidity contentions. Moreover, on our April 17, 2025 meet and confer, Stratasys was unable to provide any details of the scope of its document search or the dates by which it will supplement its production.

Starting with Stratasys's most recent production from April 21, 2025, we note that the production merely comprised a few license agreements, a single IP and publication agreement, and documents related to the MakerBot/UltiMaker corporate reorganization. As we discussed on the April 17, 2025 meet and confer, we would have expected Stratasys to have already produce documents relating to:

1. the Stratasys products that Defendants have identified as prior art in invalidity contentions served almost three months ago;
2. any Stratasys products or planned products that practice or previously practiced the asserted patents;
3. the named inventor's documents;
4. the documents relating to the MakerBot/UltiMaker deal; and

5. licenses and related correspondence.

Though Stratasys recently produced some documents responsive to categories 4 and 5, its production remains deficient. As a non-exhaustive example, we understand that MakerBot is the purported original assignee for multiple patents that Stratasys asserts in this case (i.e., U.S. Pat. Nos. 9,168,698; 10,556,381; 10,569,466; 11,167,464; 8,562,324; and 8,747,097). We further understand that Stratasys acquired MakerBot in 2013 and owns 46.5% of the new entity formed by the merger of UltiMaker and MakerBot in August 2022. Given this acquisition, we expect that Stratasys still has possession, custody, and control over MakerBot's documents related to the asserted patents in this case. These include, without limitation:

1. Documents that evidence the operation, capabilities, and public availability of the prior art, especially systems identified in Bambu's invalidity contentions;
2. Named inventor files, notebooks, and documents relevant to the conception or reduction to practice of the alleged inventions;
3. MakerBot activities and policies related to open-source initiatives; and
4. Any other documents related to MakerBot/UltiMaker corporate reorganization, including those that inform any treatment of patent rights or valuation.

[redacted]

Defendants request that Stratasys produce at least the documents identified in Defendants' subpoena to MakerBot based on a search of its and MakerBot's repositories. Should Stratasys refute that it has possession, custody, or control of such documents within its repositories or those of MakerBot, please provide Stratasys's position in writing.

Much like this MakerBot/UltiMaker example, the remaining categories of documents—even those where at least some responsive documents have been produced (like licenses)—remain deficient. Please confirm that Stratasys is working to produce responsive documents for the remaining categories outlined above.

To that end, on the recent meet and confer, you mentioned that your search efforts are ongoing, but you did not provide any details. Please let us know when we can expect your next production and what it will contain. To the extent that your next production does not include the categories of documents referenced in this email, please specify when we can expect documents for each of the above categories.

Finally, Stratasys did not provide its position on whether it will search for documents related to Defendants' open-source requests. We have repeatedly explained why these documents are relevant to our defenses and provided supplemental initial disclosures regarding the same, but Stratasys did not commit to searching for any responsive documents, despite not providing a basis for its failure to do so. Nor did Stratasys supplement its response to Defendants' open-source interrogatories. Please let us know whether Stratasys will search for documents responsive to Defendants' open-source

requests and supplement the corresponding interrogatories, or whether the parties have reached an impasse warranting a motion to compel.

As we have been discussing these issues for many weeks now, we expect a response from Stratasys within the next week. If that is not possible, please state why and provide your availability to meet and confer.

Thanks,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.

T: 214 292 4073 | pirouznia@fr.com | Bio

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Wednesday, April 16, 2025 5:18 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

I'm glad you brought up the April 11 production. Like Stratasys's prior productions, the April 11 production consists almost entirely of public documents. Indeed, just like Stratasys's last production, the April 11 production contains only a single document with any confidentiality designation—bringing the grand total of confidential Stratasys documents up to two.

You complain about what Bambu had not produced until March 27, yet you cannot deny that Bambu has produced **hundreds of confidential source code files** and **1,514 confidential documents**, while Stratasys has produced **only two confidential documents**. Nor can you deny that the November 29, 2024 Additional Disclosure deadline "was not merely the date that discovery begins" and thus Stratasys "should have begun collecting and producing documents before the Additional Disclosures deadline," yet failed to do so. *Maxell Ltd. v. Apple Inc.*, No. 5:19-CV-00036-RWS, 2019 WL 7905454, at *2 (E.D. Tex. Nov. 13, 2019).

Your excuse that Bambu had not previously raised a deficiency regarding Stratasys's prior art systems is unmoving as well. Bambu identified these prior art systems in its January 30, 2025 Invalidity Contentions, and the local rules do not require any further action for Stratasys to know that such documents are relevant to Bambu's defenses and thus subject to the disclosure requirements of the Discovery Order.

Finally, your position regarding Bambu's open-source defense is also untenable. As you are well aware, the Discovery Order requires Stratasys to produce all documents relevant to the claims and defenses "[w]ithout awaiting a discovery request." Dkt. 35 at ¶3. Bambu's supplemental initial disclosures explained why the contributions to open-source software made by Stratasys and others "may have resulted in the Asserted Patents being licensed under an open-source license"—irrespective of whether Stratasys's infringement contentions identified any open source code. Stratasys's open source licenses are also relevant to its claims, including the proper value of the asserted patents and technology at issue. As such, the propriety of Bambu's discovery requests is not dependent on its ability to identify "any of Bambu's accused functionality 'present in open-source software,'" as you now demand.

We look forward to discussing these issues further tomorrow.

Best regards,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.

T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Tuesday, April 15, 2025 6:06 PM
To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

We note that your March 28th email never requested a response. Rather, you indicated you would "follow up once [your] review is complete" regarding Stratasys's additional production of documents. In any event, as you are now aware, Stratasys produced its next batch of documents in the evening of April 11th. Consistent with Stratasys's rolling document production efforts, we expect another production of internal documents this week and more to follow in subsequent weeks.

Additionally, your focus on confidential documents as the relevant barometer is perplexing given that it is Bambu, not Stratasys, that are the accused infringers in this case and are expected to produce the vast majority of confidential technical documents and damages information. *See, e.g.*, *Seagen Inc. v. Daiichi Sankyo Co.*, 546 F. Supp. 3d 515, 530 (E.D. Tex. 2021) (recognizing that "[i]n patent infringement cases, the bulk of the relevant evidence usually comes from the accused infringer") (quoting *In re Genentech, Inc.*, 566 F.3d 1338, 1345 (Fed. Cir. 2009)). As Stratasys has repeatedly noted, Bambu has failed to do so. Indeed, Bambu had failed to produce **any** confidential technical documents until a 163-document production on March 27th (which was deficient in its own right as noted in our April 4th correspondence).

Your supplement regarding Bambu's "open-source" theory (served on April 8th) is premised on the unsubstantiated position that "to the extent Stratasys accuses functionality present in open-source software, such functionality may be licensed pursuant to open-source licenses." However, you already have Stratasys's infringement contentions, and you should already know if Stratasys has accused Bambu functionality present in open-source software. In view of Stratasys's infringement contentions, is any of Bambu's accused functionality "present in open-source software"? If so, please identify the functionality and corresponding open-source software that is implicated. If Bambu is not able to provide this information, Bambu's requests related to "open-source software" appear to be nothing more than a fishing expedition, and there is nothing more that Stratasys can provide to Bambu based on the current set of claims and defenses in the case.

Regarding Stratasys's prior art systems (your April 11th email is the first time Bambu has asserted a deficiency with respect to these) and the remainder of your inaccurate critiques of Stratasys's search efforts and productions, let's discuss these issues at 2:00pm CT on Thursday, when we will also be addressing Defendants' various discovery deficiencies.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, April 11, 2025 2:37 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Christian,

I'm following up on my email from March 28, which you never responded to.

Stratasys's document production remains deficient. Indeed, Stratasys has not produced any documents since March 28, and that production once again consisted almost entirely of public materials that Stratasys collected months ago. For example, 922 of the 948 documents are press releases, only 39 of the documents were collected this year, and only one document was designated confidential. Worse, that one document is the **only confidential document** that Stratasys has produced to date.

As Stratasys requested, Bambu supplemented its initial disclosures regarding its defenses. Yet Stratasys still has not provided any documents related to the open-source software at issue.

Bambu's January 30, 2025 invalidity contentions also put Stratasys on notice of the relevant Stratasys prior art systems at issue in this case, yet over two months later, Stratasys still has not produced a single document regarding these systems.

And as explained on our meet and confer back in February and in my correspondence from March, Stratasys has not even confirmed it has searched for clearly relevant documents—including, for example, the documents of the **formerly employed inventors of the asserted patents**.

Please respond by April 16 and provide a date certain by which Bambu can expect a substantive document production and details of Stratasys's search efforts. Otherwise provide your availability to meet and confer. As a reminder, I requested this information in my correspondence from March 14, 2025, yet Stratasys never responded. If Stratasys continues to ignore its discovery obligations and Bambu's requests, we will be forced to bring this issue to the Court's attention.

Thanks,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, March 28, 2025 5:03 PM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Christian,

We disagree with your characterization of Stratasys's productions to date.

At the outset, you do not dispute that Stratasys had only produced 55 documents from the Additional Disclosure Deadline of November 29, 2024 until Stratasys's March 20, 2025 production—a period of 111 days.

That recent production from March 20, 2025 is equally as troubling. While it contains 940 documents, nearly all of those appear to be PDFs of publicly available webpages. 914 of the documents have a creation date in July 2024 or earlier, suggesting that Stratasys has been in possession of these documents since before its Additional Disclosure Deadline but only produced them recently. Even under a framework of rolling production, the local rules require Stratasys to promptly produce documents that have already been collected and these should have been produced earlier.

Most fundamentally, we remain concerned that Stratasys does not appear to have undertaken any serious effort to collect and produce internal documents. We recognize that Stratasys has made another production today, which is currently being ingested but appears to be only 3,543 pages. We will follow up once our review is complete and sincerely hope that this latest production is more substantive than the prior ones. If Stratasys believes that it has no responsive internal documents that it is required to produce in this case other than the documents produced today, please so state in writing and let us know your availability to meet and confer on this issue.

We also disagree with your characterization of the prior meet and confer. We did not recognize that any of Bambu's requests as overbroad or recognize a need to provide more narrowly tailored requests. Instead, we explained the information sought and identified representative documents that we expected Stratasys to locate after a reasonably diligent search. It was clear from the call that Stratasys had not even begun such a diligent search, as it could not even identify any of the document repositories it had identified or the search efforts already taken for unquestionably relevant materials such as the documents of the inventors.

Regarding your request that we supplement our initial disclosures, we disagree that such a supplement is necessary to open the doors of discovery into our potential defenses. Nevertheless, in an attempt to moot this dispute, we agree to provide supplementary disclosures.

Finally, please see attached for correspondence detailing the deficiencies we have identified so far in Stratasys's interrogatory responses.

Best regards,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Wednesday, March 26, 2025 1:08 PM

To: Aaron Pirouznia <pirouznia@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

I write in relation to your March 14th Letter. As discussed during our February 28th meet and confer, Stratasys has met its discovery obligations and continues to produce additional responsive documents on a rolling basis. In addition to the supplemental document production provided on March 20th, we expect to serve another document production later this week. As we explained during the meet and confer, additional document productions will occur on a rolling basis as appropriate.

Additionally, as you recognized during our meet and confer, many of Defendants' requests for production are overbroad, making search efforts unduly burdensome (e.g., RFP Nos. 13, 15, 39, 45). You agreed to follow up with more narrowly tailored requests (e.g., by limiting the temporal and/or subject matter scope of such requests). Nearly a month has passed, and you have not followed up.

Furthermore, for other requests (e.g., RFP No. 68) we told you that they have no relevance to the pled claims or defenses in this case. You indicated that such requests may be relevant to defenses that Defendants may choose to assert in the future. You further stated that Defendants would consider answering the complaint or otherwise providing additional information on such defenses. Again, it is nearly a month later, and Defendants have neither answered nor provided any additional information. We note that Defendants have also propounded multiple interrogatories—as well as third-party requests for production and deposition topics—related to open-source software, which are also irrelevant to this case. If Defendants contend that such requests are relevant, we need some understanding as to how. By **April 2nd**, please supplement your initial disclosures to comply with Paragraph 1(c) of the Court's Discovery Order by setting out "the legal theories and, in general, the factual bases of [Defendants'] claims or defenses." To the extent Defendants fail to do so, we will understand that such requests have no relevance to any issue in this case.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Friday, March 14, 2025 11:53 AM
To: Tatum, Christian <ctatum@mwe.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Counsel,

Please see the attached correspondence regarding Stratasys's deficient document production.

Thanks,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Tatum, Christian <ctatum@mwe.com>
Sent: Monday, February 24, 2025 5:16 PM
To: Aaron Pirouznia <pirouznia@fr.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Aaron,

I can confirm that 2-3 pm on February 28th works for us. I will send you an invite for that time.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Monday, February 24, 2025 4:45 PM
To: Tatum, Christian <ctatum@mwe.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[External Email]

Hi Christian,

Just wanted to confirm this so I can get it on my calendar. Do you want us to send an invite?

Thanks,
Aaron

From: Aaron Pirouznia
Sent: Thursday, February 20, 2025 4:05 PM
To: 'Tatum, Christian' <ctatum@mwe.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys

<FRServiceBambuLabStratasys@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

Hi Christian,

2-3 pm on February 28 works for us.

Thanks,
Aaron

From: Tatum, Christian <ctatum@mwe.com>
Sent: Tuesday, February 18, 2025 7:18 PM
To: Aaron Pirouznia <pirouznia@fr.com>; Shelly Prim <Prim@fr.com>; FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Cc: Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

[This email originated outside of F&R.]

Aaron,

In relation to the above-referenced matter, attached for service please find Plaintiff Stratasys, Inc.'s correspondence regarding Defendants' document production deficiencies. Counsel for Plaintiff is available to meet and confer regarding the issues raised in Defendants' February 10th correspondence, as well as the issues raised in Plaintiff's attached letter, at 2-3pm or 4-5pm on February 27th or 28th. Please let us know if one of those times works for Defendants.

Regards,
Christian

CHRISTIAN TATUM
Associate
McDermott Will & Emery LLP 300 Colorado Street, Suite 2200, Austin, TX 78701
Tel +1 512 298 4614 **Email** ctatum@mwe.com
Website | vCard | LinkedIn

From: Aaron Pirouznia <pirouznia@fr.com>
Sent: Tuesday, February 18, 2025 10:19 AM
To: Shelly Prim <Prim@fr.com>; Stratasys-MWE <Stratasys-MWE@mwe.com>; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Cc: FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

> Some people who received this message don't often get email from pirouznia@fr.com. Learn why this is important

[External Email]

Counsel,

We have not heard back on your availability to meet and confer. Please respond.

Thank you,
Aaron

Aaron P. Pirouznia
Principal ■ Fish & Richardson P.C.
T: 214 292 4073 | pirouznia@fr.com | Bio

From: Shelly Prim <Prim@fr.com>
Sent: Tuesday, February 11, 2025 9:13 AM
To: Stratasys-MWE@mwe.com; ddacus@dacusfirm.com; Andrea L. Fair <andrea@millerfairhenry.com>; Claire A. Henry <claire@millerfairhenry.com>
Cc: FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: FW: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

On behalf of Mr. Pirouznia,

Please find the attached correspondence for your review.

Regards.

Shelly L. Prim
Litigation Paralegal to Carl E. Bruce, Ricardo J. Bonilla, Lance E. Wyatt, Jr., Rae Crisler, Aaron Pirouznia, and Nan Lan
1717 Main Street | Suite 5000 | Dallas, TX 75201|
direct: (214) 760-6152 | main: (214) 747-5070 | facsimile: (214) 747-2091 | prim@fr.com | www.fr.com |

From: Shelly Prim
Sent: Monday, February 10, 2025 3:51 PM
To: 'kmeek@mwe.com' <kmeek@mwe.com>
Cc: Aaron Pirouznia (pirouznia@fr.com) <pirouznia@fr.com>; Brandon Avers <avers@fr.com>
Subject: Case No. 2:24-cv-00644-JRG (E.D. Tex.); Stratasys, Inc. v. Shenzhen Tuozhu Tech. Co., Ltd.

On behalf of Mr. Pirouznia,

Please find the attached correspondence for your review.

Regards.

Shelly L. Prim
Litigation Paralegal to Carl E. Bruce, Ricardo J. Bonilla, Lance E. Wyatt, Jr., Rae Crisler, Aaron Pirouznia, and Nan Lan

1717 Main Street | Suite 5000 | Dallas, TX 75201|
direct: (214) 760-6152 | main: (214) 747-5070 | facsimile: (214) 747-2091 | prim@fr.com | www.fr.com |

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