IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRATT RETAIL SPECIALTIES, LLC, Plaintiff/Counterclaim Defendant, vs. PROAMPAC LLC, Defendant/Counterclaim Plaintiff.	)	Case No.: 1:24-cv-01073-RGA **JURY TRIAL DEMANDED**

PLAINTIFF PRATT RETAIL SPECIALTIES, LLC'S FIRST
REQUESTS FOR PRODUCTION TO DEFENDANT PROAMPAC LLC (NO. 1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rule 26.1 of the Local Rules, Plaintiff/Counterclaim Defendant Pratt Retail Specialties, LLC, by its undersigned counsel, hereby requests that Defendant/Counterclaim Plaintiff ProAmpac LLC produce documents and things responsive to the following Requests for the Production of Documents (the "Requests") at the office of Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339, or such other place as the parties may agree, within thirty (30) days of service.

DEFINITIONS

Notwithstanding any definition set forth below, each word, term, or phrase used in these Requests is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure. In these Requests, the following terms are to be given their ascribed meaning, regardless of whether upper-case or lower-case letters are used:

1. The terms "Defendant" or "ProAmpac" mean ProAmpac LLC, defendant in this Action, and ProAmpac Holdings Inc., the party identified by Defendant as the real party in interest, including their officers, directors, parents, subsidiaries, divisions, affiliates, predecessors,

successors, employees, accountants, agents, representatives, and any other person acting under its control or on its behalf.

2. The term "Accused Product" means any one or all of Defendant's products identified by Plaintiff in the Complaint, including Defendant's "ProActive Recyclable FiberCool" bag, and all variations thereof that operate in substantially the same manner, or have substantially the same characteristics, including but not limited to different generations or versions thereof, and any substantially similar products described, marketed, operated, or otherwise referred to under a different name or product line.

REQUESTS FOR PRODUCTION

REQUEST NO. 1: Ten physical samples of each version or variation of the Accused Product made, used, sold, offered for sale, or imported into the United States by Defendant.

Dated: April 10, 2025

/s/ Cortlan S. Hitch

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