

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN RONGLIDA TECHNOLOGY CO. LTD.,
Petitioner,
v.
PATHWAY IP LLC,
Patent Owner.

Case No. IPR2025-01231
U.S. Patent No. 7,841,729

PATENT OWNER'S PROPOSED REQUESTS FOR PRODUCTION

Patent Owner Pathway IP LLC submits the following proposed Requests for Production, for which it seeks authorization in its Motion for Additional Discovery.

Request 1. All documents sufficient to identify each person and entity that received any draft of a petition for inter partes review of U.S. Patent No. 7,841,729 prior to the filing of the instant Petition on July 11, 2025.

Request 2A. All communications between Qingqing Duan and any person or entity, other than counsel of record, concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 2B. All communications between Qingqing Duan and counsel of record concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 3A. All communications between Qingqing Duan and any person or entity, other than counsel of record, concerning U.S. Patent No. 7,841,729.

Request 3B. All communications between Qingqing Duan and counsel of record concerning U.S. Patent No. 7,841,729.

Request 4A. All engagement letters or retention agreements between any person or entity and Glacier Law LLP, which currently appears in this

proceeding, concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 4B. All engagement letters or retention agreements between any person or entity and Dinsmore & Shohl LLP, which previously appeared in this proceeding, concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 5. Documents sufficient to show any payment made to Qingqing Duan by or on behalf of Shenzhen Neewer Technology Co., Ltd., Shenzhen Xing Ying Da Industry Co., Ltd., or any of the Neewer Defendants identified in Patent Owner's Preliminary Response, including in connection with any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 6A. All communications between the named Petitioner, or any person acting on the named Petitioner's behalf, and Shenzhen Neewer Technology Co., Ltd., Shenzhen Xing Ying Da Industry Co., Ltd., or any of the Neewer Defendants identified in Patent Owner's Preliminary Response, concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 6B. All communications between the named Petitioner, or any person acting on the named Petitioner's behalf, and counsel of record concerning any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 7. Documents sufficient to show the ownership and shareholding of Shenzhen Ronglida Technology Co. Ltd. from its formation to its deregistration, including any transfer of shares or ownership interest to or from Qingqing Duan.

Request 8A. Documents sufficient to show any payment made to Glacier Law LLP, by any person or entity, in connection with any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 8B. Documents sufficient to show any payment made to Dinsmore & Shohl LLP, by any person or entity, in connection with any challenge to the validity of U.S. Patent No. 7,841,729, including IPR2025-01231.

Request 9. All documents sufficient to identify each person or entity that provided, contributed, or paid any funds or capital used to establish, register, or capitalize Shenzhen Ronglida Technology Co. Ltd., and all documents concerning the source of those funds.