

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QINGQING DUAN
Petitioner

v.

PATHWAY IP LLC
Patent Owner

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

**PETITIONER'S RESPONSES TO
PATENT OWNER'S REQUESTS FOR PRODUCTION (EX. 2042)**

Pathway Exh. 2050-1
Qingqing Duan v. Pathway IP LLC
IPR 2025-01231

Pursuant to the Board's July 10, 2026 Order granting Patent Owner's Motion for Additional Discovery, Petitioner Qingqing Duan ("Petitioner" or "Ms. Duan") serves the following objections and responses to the requests set forth in Patent Owner Exhibit 2042.

INTRODUCTORY STATEMENT AND GENERAL RESPONSES

1. These responses are based on information and documents presently available after a reasonable inquiry. Collection and review are ongoing. Petitioner will timely supplement these responses and the accompanying production if additional responsive material is located.

2. For purposes of these responses, "Petitioner" means Qingqing Duan and, where the context requires, the corporate entity Shenzhen Ronglida Technology Co., Ltd. before its deregistration. This usage is not an admission regarding any disputed real-party-in-interest, agency, affiliation, funding, control, or successor-liability issue.

3. Petitioner will not withhold responsive material based on relevance, burden, or scope objections already resolved by Paper 29. Petitioner preserves objections only to the extent a request is applied beyond Exhibit 2042 or Paper 29, seeks material outside Petitioner's possession, custody, or control after reasonable efforts, or calls for material protected by a legally recognized privilege or protection.

4. Petitioner withholds or redacts responsive material only where such withheld/redacted information is protected by the attorney-client privilege, attorney

work-product doctrine, or another legally recognized protection. Each responsive item withheld or redacted on that basis will be identified on a privilege log with sufficient information to evaluate the claim without disclosing the protected content.

5. An attorney's presence on a communication does not by itself establish privilege. Nonprivileged attachments will be produced even when the transmitting email is withheld. For communications involving a third party, Petitioner will state the participant's role and the basis, if any, on which confidentiality and protection were maintained.

6. Petitioner may redact account numbers, personal identifiers, unrelated transactions, and nonresponsive information appearing in mixed financial records. The payer, payee, date, amount, and matter or purpose of a responsive payment will not be redacted. Privilege redactions will be identified on the privilege log; privacy-only redactions will be labeled on the face of the document.

7. Confidential business, employment, financial, engagement, or fee information will be produced subject to an agreed confidentiality protocol or appropriate protective order. Production does not authorize public filing; any party seeking to file confidential material must comply with the Board's sealing and protective-order requirements. Patent Owner should treat all responsive information as being "attorneys' eyes only" during the discovery process, and Petitioner will work with Patent Owner to file materials under appropriate designations if and when the materials

need to be filed.

8. Documents previously served or filed may be identified by Paper or Exhibit number. Such identification does not concede admissibility or the truth of Patent Owner's characterizations.

9. Inadvertent production of privileged or protected material is not intended as a waiver. The parties should promptly meet and confer concerning return, sequestration, deletion, and non-use of any inadvertently produced material.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Following a reasonable search, Petitioner identified a responsive written communication dated *July 7, 2025*. On that date, counsel transmitted a draft of the Petition to Petitioner Qingqing Duan for review and signature through the WeChat group titled "ILND-24-5218-~~明~~灯." The confidential transmittal communication and attached pre-filing draft were exchanged between counsel and the client for the purpose of obtaining and providing legal advice and preparing the Petition. They are withheld under the attorney-client privilege and attorney work-product doctrine and are

separately identified on Petitioner's privilege log. No nonprivileged responsive document was located.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Following a reasonable inquiry and search, Petitioner has located no responsive documents in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Except for the July 7, 2025 WeChat communication and attached draft identified in response to Request No. 1 and on Petitioner's privilege log, responsive communications between Petitioner and counsel have occurred orally by telephone on as as-needed basis. No recording, transcript, or other written memorialization of those telephone communications exists. The July 7 communication and attached draft petition are withheld under the attorney-client privilege and attorney work-product doctrine.

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REQUEST FOR PRODUCTION NO. 3A

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

RESPONSE:

Following a reasonable inquiry and search, Petitioner has located no responsive documents in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 3B

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

RESPONSE:

Petitioner located the July 7, 2025 WeChat communication described in response to Request No. 1. That communication and its attachment are withheld and identified on Petitioner's privilege log. Apart from that WeChat communication, responsive communications between Petitioner and counsel occurred orally by telephone, and no recording, transcript, or other written memorialization of those telephone communications exists.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Following a reasonable inquiry and search, Petitioner has located no responsive documents. Glacier Law LLP did not enter into an engagement agreement with the current Petitioner or former Petitioner Shenzhen Ronglida Technology Co., Ltd. concerning a challenge to U.S. Patent No. 7,841,729.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Petitioner will produce the April 14, 2025 Dinsmore & Shohl LLP engagement letter concerning the contemplated *inter partes* review of U.S. Patent No. 7,841,729. Wei Wang of Glacier Law LLP executed the engagement letter on April 21, 2025 as attorney for and on behalf of the client.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Following a reasonable inquiry and search, Petitioner has located no responsive documents in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Following a reasonable inquiry and search, Petitioner has located no responsive documents in her possession, custody, or control.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Except for the privileged July 7, 2025 WeChat communication and attached draft identified in response to Request No. 1 and on Petitioner's privilege log, communications responsive to this Request occurred orally by telephone as needed. No

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recording, transcript, or other written memorialization of those telephone communications exists. The July 7 communication and attached draft are withheld under the attorney-client privilege and attorney work-product doctrine.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Petitioner will produce documents sufficient to show Shenzhen Ronglida Technology Co., Ltd.'s ownership and shareholding history from formation through deregistration, including any transfer of shares or ownership interest to or from Qingqing Duan.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Petitioner will produce documents sufficient to show responsive payments to Glacier Law LLP, including the payer, date, amount, and matter.

REQUEST FOR PRODUCTION NO. 8B

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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.

RESPONSE:

Glacier Law LLP transmitted the responsive payment to Dinsmore & Shohl LLP on the client's behalf. Petitioner will produce documents sufficient to show that payment, including the payer, date, amount, and matter.

REQUEST FOR PRODUCTION NO. 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.

RESPONSE:

Shenzhen Ronglida Technology Co., Ltd.'s registered capital was subscribed but was not actually paid or contributed. Following a reasonable inquiry and search, Petitioner has located no documents showing that any person or entity provided, contributed, or paid funds or capital to establish, register, or capitalize the company.

PRIVILEGE LOG AND PRODUCTION

Petitioner is serving an accompanying privilege log identifying the July 7, 2025 WeChat transmittal and the attached draft Petition withheld under the attorney-client

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privilege and attorney work-product doctrine. The log identifies the applicable Request numbers and the basis for each claim without disclosing protected substance.

Respectfully submitted,

Date: July 31, 2026

/Benjamin E. Weed/
Benjamin E. Weed, Reg. No. 65,939
Attorney for Petitioner

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on July 31, 2026, a complete and entire copy of this PETITIONER'S RESPONSES TO PATENT OWNER'S REQUESTS FOR PRODUCTION (EX. 2042) were provided via email to the Petitioner by serving the correspondence address of record as follows:

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