

From: [Hanson, Tina](#)
To: [Mark Zambarda](#); [Stephen Baskin](#); [Kyle Sampson](#); [Joseph Eng](#); [Tyler Boyce](#); [Nicholas Sieger](#); [Klett III, William](#)
Cc: [Devine, Wendy](#); [aries](#); [Cheryl Bona](#); [WSGR - Thorne/ChromaDex DJ \(505\)](#)
Subject: RE: Thorne Research, Inc. et al v. Niagen Bioscience, Inc. et al (D.S.C. 2:26-cv-01758-RMG)
Date: Thursday, October 8, 2026 10:51:10 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Counsel,

Thank you for speaking with us today. The discussion from our meet and confer is memorialized below:

1. **Scheduling Order.** There are no changes to Defendants' positions on the scheduling order, and Plaintiffs maintain that longer timelines are required to accommodate the necessary foreign discovery in this case. You asked whether Plaintiffs' position would change if QUB were dismissed. We indicated it would not; dismissal would increase the need for foreign discovery unless QUB voluntarily agrees to participate in discovery as if it were a party. Foreign discovery would also still be required as to inventors who are no longer affiliated with QUB. We appreciate that Defendants will endeavor to secure the inventors' voluntary participation; however, we have not yet received assurances sufficient to avoid the need for foreign discovery.
2. **Protective Order.** You stated that Defendants are still reviewing the draft we sent last week and will send comments once that review is complete. We inquired specifically about whether any of the provisions proposed, including the prosecution bar, the need for two-tiers of discovery, and the AI provision, were objectionable, but you indicated you would follow up with written comments shortly.

Best,
Tina



Tina Hanson (she/her) | Wilson Sonsini Goodrich & Rosati

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From: Hanson, Tina
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Noon Eastern is good for us. I'll send an invite shortly. I would like to discuss the proposed PO as well.

Best,
Tina

From: Mark Zambarda <MZambarda@KSLAW.com>
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EXT - mzambarda@kslaw.com

Hi Tina,

Would tomorrow at 12pm or 2pm ET work to meet and confer on the schedule?

Mark Zambarda
Senior Associate

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From: Hanson, Tina <thanson@wsgr.com>
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CAUTION: MAIL FROM OUTSIDE THE FIRM

Counsel,

In light of the Court's order that the parties should each submit a motion for an amended scheduling order, please let us know your availability to further meet and confer on the schedule, preferably today.

Best,
Tina



Tina Hanson (she/her) | Wilson Sonsini Goodrich & Rosati



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