

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

In re U.S. Patent No. 6,240,376 Application No.: 09/127,587 Filed: July 31, 1998 Issued: May 29, 2001 Inventors: Alain Raynaud Luc M. Burgun Patent Owner: Mentor Graphics Corporation For: METHOD AND APPARATUS FOR GATE-LEVEL SIMULATION OF SYNTHESIZED REGISTER TRANSFER LEVEL DESIGNS WITH SOURCE-LEVEL DEBUGGING	Trial No.: IPR 2012-00042 Atty. Dkt. No. 007121.00004
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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

**[PROPOSED] PATENT OWNER'S REQUESTS FOR PRODUCTION
TO PETITIONER**

Pursuant to the Board's authorization, Patent Owner Mentor Graphics Corporation ("Mentor Graphics") hereby propounds the following Requests for Production on Petitioner Synopsys, Inc. ("Synopsys"). Mentor Graphics requests that Synopsys deliver written responses and responsive documents and things to each of these Requests to the offices of Banner & Witcoff, Ltd, 1100 13th Street, NW, Suite 1200, Washington, DC 20005, within fourteen (14) calendar days of the service date hereof.

DEFINITIONS

As used herein, the following words shall have the meanings indicated:

1. **"Mentor Graphics"** means Patent Owner Mentor Graphics Corporation, as well as its subsidiaries, divisions, affiliates, assigns, present and former officers, directors, employees, related corporations and agents.
2. **"Synopsys"** means Synopsys, Inc. and all of its subsidiaries, divisions, affiliates, assigns, present and former officers, directors, and employees, related corporations and agents.
3. **"EVE"** means Emulation and Verification Engineering, S.A. (now named Synopsys Emulation and Verification S.A.) and EVE-USA, Inc., and all of their subsidiaries, divisions, affiliates, assigns, present and former officers, directors, employees, related corporations and agents.
4. **"376 Patent "** means U.S. Patent No. 6,240,376.

5. “**Burgun**” means Luc Burgun, named co-inventor of the '376 Patent.
6. “**Communication**” means every manner or method of disclosure or transfer or exchange of information, whether orally or by document, and whether face to face, by telephone, mail, email, personal delivery or otherwise. Unless otherwise indicated, a request calling for communications includes internal communications as well as communications with a third person.

INSTRUCTIONS

In the event any document is withheld on a claim of attorney/client privilege, work product immunity, or any other privilege, provide a detailed privilege log that describes the nature and basis for Synopsys' claim and the subject matter of the document withheld, in a manner sufficient to disclose facts upon which Synopsys relies in asserting the claim, and to permit the grounds and reasons for withholding the document to be identified. Such description should, at a minimum, state: (a) the date of the document; (b) the author of the document; (c) each person who participated in the preparation of the document; (d) each person identified on the document as a recipient or copy; (e) the general subject matter of the document; and (f) sufficient further information to explain the claim of privilege or immunity and permit the adjudication of the propriety of that claim.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

Copies of the executed merger or acquisition agreement(s) between Synopsys and EVE, and all exhibits and appendices thereto.

REQUEST NO. 2:

Copies of any memoranda of understanding, commitment letters, letters of intent, or similar documents prepared or sent by EVE or Synopsys in connection with, or in contemplation of, the executed merger or acquisition agreement(s) referred to in REQUEST NO. 1.

REQUEST NO. 3:

Copies of any joint defense agreement between Synopsys or EVE or other agreement between Synopsys or EVE reflecting a common interest with respect to the '376 Patent or a petition for *inter partes* review of that patent.

REQUEST NO. 4:

Communications between Synopsys and EVE, occurring on or before September 27, 2012, regarding or relating to any or all of (i) the decision to seek *inter partes* review of '376 patent, or (ii) the petition for *inter partes* review that was ultimately filed by Synopsys regarding the '376 Patent.

REQUEST NO. 5:

Copies of organizational charts or other documents sufficient to identify Synopsys' organizational and corporate structure after Synopsys acquired EVE.

REQUEST NO. 6:

Copies of any employment or other agreement between Synopsys and Burgun predating October 4, 2012.

REQUEST NO. 7:

Communications before October 4, 2012, regarding or relating to Burgun's role at Synopsys.

REQUEST NO. 8:

Copies of documents sufficient to show Burgun's role(s) at Synopsys since October 4, 2012.

REQUEST NO. 9:

All agreements between Synopsys and EVE, or other communications, regarding joint business activities of the two entities predating October 4, 2012, relating to the ZeBu line of emulation products.

REQUEST NO. 10:

Any documents evidencing when Synopsys actually served a copy of the Petition in the instant *inter partes* review on Mentor Graphics' counsel of record

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