

Appendix A: Support For Relevance of Each Request in the FTC’s 6(b) Order

Appendix A:
Support For Relevance of Each Request in the FTC’s 6(b) Order

| Request | Description | Justification |
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| A. Identification of Report Author | | |
| A. | Identify by full name, title, business address, telephone number, and official capacity the Person(s) who prepared or supervised the preparation of the Firm’s response to the Information Requests and specify the steps taken by the Firm to respond to the Information Requests. | Prerequisite to ensuring the Commission is furnished with uniform information as to respondent organization, business, conduct, practices, management, and relation to others. |
| B. Company Information: | | |
| B.1. | State the Firm’s complete legal name and all other names under which it has done business, its corporate mailing address, all addresses from which it does or has done business, and the dates and states of its incorporation. | Furnishes the Commission with uniform information as to respondent organization, business, conduct, practices, management, and relation to others. |
| B.2. | Describe the Firm’s business or corporate structure, and state the names of all parents, subsidiaries (whether wholly or partially owned), divisions (whether incorporated or not), affiliates, branches, joint ventures, franchises, operations under assumed names, websites, or entities over which the Firm exercises supervision or control, or any other Person(s) or entities with a contractual or other legal right to a share of revenues, profits, or other Economic Interest tied to profitability or financial performance of the Firm. For each such entity, describe the relationship with the Firm, including the | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, disclosure of PAE patent ownership, PAE investors and financing, and potential privateering activity is consistent with the law and public interest. (See Comments of Adobe Systems, Inc., Canon U.S.A., Inc., Cisco Systems, Inc., Dell Inc., Ford Motor Company, Google, Inc., Hewlett-Packard Company, Limelight Networks, Inc., Rackspace US, Inc., and SAP Americas, Inc.¹ <i>supra</i> at pages 5-9, 12-13, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 15, 16).</p> |

¹ Hereinafter, “Joint Comments.”

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| | percentage of ownership, control, or other legal entitlement to a share of revenues, profits or financial performance between the Firm and the entity. When responding to Requests A-H, provide all information for the Firm and all related entities identified in response to this request. | |
| B.3. | Identify each Person or entity having an ownership interest in the Firm, or other legal entitlement to share in the financial performance of the Firm, as well as their individual ownership or financial performance stakes, and, if relevant, their positions and responsibilities within the Company. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, disclosure of PAE patent ownership and transparency, PAEs’ investors and financing, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-12, 14, 16-18).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 15, 16).</p> |
| C. Patent Information | | |
| 1. | Identify each Patent held by the Firm since January 1, 2008, and specify: | |
| C.1.a-d. | (a) The Patent number. (b) The date the Patent was acquired. (c) The Patent title. (d) The Patent’s Class, Subclass, and Art Unit. | Prerequisite information reasonably relevant to the Commission’s determination of whether aggregator activity, disclosure of PAE patent ownership, PAEs’ investors and financing, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 12-13, 14-15, 16-17). |
| C.1.e-g. | (e) The Patent’s filing date. (f) The Patent’s issuance date. (g) The Patent’s expiration date. | Prerequisite information reasonably relevant to the Commission’s determination of whether aggregator activity, disclosure of PAE patent ownership, PAEs’ investors and financing, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 12-13, 14-15, 16-17). |
| C.1.h. | The maintenance status of the Patent, including whether the Patent has expired for | Prerequisite information reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership, PAEs’ investors and financing, and |

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| | failure to pay Maintenance Fees. | exploitation of low-value patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 14-15). |
| C.1.i. | Whether the Firm is engaged in pre-grant prosecution for any identified Patent application. | Prerequisite information reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 14-15, 16-17). |
| C.1.j. | Whether the Firm has abandoned any identified Patent application. | Prerequisite information reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 14-15, 16-17). |
| C.1.k. | Whether the Firm is engaged in post-grant prosecution for any identified Patent, and describe the nature of the post-grant prosecution. | Prerequisite information reasonably relevant to the Commission’s determination of whether the disclosure of PAE patent ownership and exploitation of low-value patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 14-15). |
| C.1.l. | Whether the Firm has engaged in any research and development activities Relating to the Patent, and specify the nature and estimated cost of this research and development activity. | Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAEs’ impact on innovation, disclosure of PAE patent ownership, exploitation of low-value patents, and end-user assertion are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 19-20). |
| C.1.m. | Whether any Person(s), other than the Firm, holds any legal rights to the Patent. As part of your response: | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others. Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-13, 14-15, 16-17). |
| C.1.m (1) | Identify the Person(s) who holds any legal rights to the Patent. | Reasonably relevant to the Commission’s determination of whether extent of reward to innovators, aggregator activity, disclosure of PAE ownership, transparency of PAE business, and potential privateering are consistent with the law and public interest. (See |

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| | | Joint Comments, <i>supra</i> at pages 6-7, 12-13, 14-15, 16-17). |
| C.1.m (2) | Describe the nature of the legal rights held. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership, transparency of PAE business, aggregator activity, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-13, 14-15, 16-17). |
| C.1.m (3) | Submit all documents(s) Relating to the legal rights held. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership, transparency of PAE business, aggregator activity, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-13, 14-15, 16-17). |
| C.1.n. | Whether any Person, other than the Firm, has an Economic Interest in the Patent. | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others. Reasonably relevant to the Commission’s determination of whether potential privateering activity, disclosure of PAE patent ownership and transparency of PAE business, PAEs’ exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 14-17). |
| C.1.n.(1) | Identify the Person(s) who hold an Economic Interest in the Patent. | Reasonably relevant to the Commission’s determination of whether potential privateering activity, disclosure of PAE patent ownership and transparency of PAE business, PAEs’ exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 14-17). |
| C.1.n.(2) | Describe the nature of the Economic Interest held by the Person(s). | Reasonably relevant to the Commission’s determination of whether potential privateering activity, disclosure of PAE patent ownership and transparency of PAE business, PAEs’ exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 14-17). |
| C.1.n.(3) | Submit all documents Relating to this Economic Interest. | Reasonably relevant to the Commission’s determination of whether potential privateering activity, disclosure of PAE patent ownership and transparency of PAE business, PAEs’ exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 14-17). |

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| C.1.o. | Whether the Patent (or any claims therein) is subject to a licensing commitment made to a Standard-Setting Organization and specify: | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.o.(1) | All Standard-Setting Organizations to which a licensing commitment has been made. | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.o.(2) | All standards to which such a licensing commitment applies. | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.o.(3) | The Person(s) who made the licensing commitment. | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.o.(4) | The date(s) on which the licensing commitment was made. | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.o.(5) | All encumbrances, including, but not limited to, all commitments to license the Patent or any of its claims on reasonable and nondiscriminatory (RAND), fair, reasonable, and non-discriminatory (FRAND), or royalty-free (RF) terms. | Reasonably relevant to the Commission’s determination of whether PAEs treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17). |
| C.1.p. | Whether the Firm has included the Patent in any Demand. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE patent ownership and transparency of PAE business, aggregator activity, and treatment of |

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| | | F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15). |
| C.1.q. | Whether the Firm has Litigated the Patent. | Reasonably relevant to the Commission’s determination of whether PAEs’ exploitation of litigation risk imbalances, assertion of low-value patents, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, end-user assertion, PAEs’ investors, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-17, 19-20). |
| C.1.r. | Whether the Firm has licensed the Patent to any Person(s). | Reasonably relevant to the Commission’s determination of whether PAEs’ reward to innovators, PAEs’ treatment of F/RAND encumbered patents, assertion of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, PAEs’ exploitation of litigation risk imbalances, and potential privateering are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-17). |
| C.2. | Provide the assignment and Assertion history for each Patent held by the Firm since January 1, 2008. As part of your response, specify: | |
| C.2.a. | All Person(s) to whom the Patent was assigned before the Firm Acquired the Patent and the date(s) of assignment. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, aggregator activity, potential privateering, PAEs’ investors, whether PAEs reward to innovators, exploitation of low-value patents, and PAEs’ treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-15, 16-17). |
| C.2.b. | All Person(s) to whom the Patent was licensed before the Firm Acquired the Patent and the date(s) and term(s) of license. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, assertion against end-users, aggregator activity, potential privateering, PAEs’ investors and financing, whether PAEs reward to innovators, PAEs’ treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-14, 14-15, 16-17, 19-20). |
| C.2.c. | Whether the Patent was Asserted before the Firm Acquired the Patent, and list the Person(s) who Asserted the Patent, the Person(s) against whom the Patent was | Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, assertion against end-users, aggregator activity, potential privateering, PAEs’ investors and financing, whether PAEs reward to innovators, PAEs’ treatment of F/RAND encumbered patents are consistent with the law |

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| | Asserted and identify whether the Assertion resulted in Litigation(s) or license(s): | and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-14, 14-15, 16-17, 19-20). |
| C.2.c.(1) | If the Assertion identified in C.2.c resulted in Litigation, provide all information requested in Request F.2. | Reasonably relevant to the Commission’s determination of whether the end-user assertion, aggregator activity, potential privateering, PAEs’ investors, whether PAEs reward to innovators, and PAEs’ treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-14, 14-15, 16-17, 19-20). |
| C.2.c.(2) | If the Assertion identified in C.2.c resulted in a license agreement, provide all information requested in F.3. | Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, assertion against end-users, aggregator activity, potential privateering, PAEs’ investors, PAEs’ reward to innovators, and PAEs’ treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-14, 14-15, 16-17, 19-20). |
| C.2.c.(3) | State whether the Assertion identified in C.2.c involved a technology adoption provision, and provide all technology adoption agreements Relating to this response. | Reasonably relevant to the Commission’s determination of whether the impact on others’ innovative efforts, disclosure of PAE ownership and transparency of PAE business, aggregator activity, potential privateering, PAEs’ investors, and PAEs’ reward to innovators are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 12-14, 14-15, 16-17). |
| C.3 | Submit all documents Relating to any communication since January 1, 2008 between the Firm and any investor or potential investor, financial or otherwise, Relating to any Patent(s) held by the Firm since January 1, 2008. | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others. Reasonably relevant to the Commission’s determination of whether PAEs’ investors and financing, potential privateering, aggregator activity, PAEs’ reward to innovators, disclosure of PAE ownership and transparency of PAE business, assertion against end-users, and PAEs’ treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-14, 14-15, 16-17). |
| D. Patent Portfolio Information: | | |
| 1. | Describe all Patent Portfolios held by the Firm since January 1, 2008; and specify: | |
| D.1. a. | How the Firm organizes the Patent Portfolio(s). | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices and management. |

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| | | Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-16). |
| D.1.b. | The numbers of the Patents included in the Patent Portfolio(s). | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices and management. Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents and exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-16). |
| D.1.c. | The Firm’s valuation of the Patent Portfolio(s) and the date of the valuation. | Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and exploitation of litigation risk imbalances are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-16). |
| D.2. | Submit all documents Relating to the Firm’s reasons or business strategy for organizing the Patent(s) into Portfolio(s), including but not limited to, market analyses, financial analyses, business plans, statements to investors and potential investors, and disclosures required by the Securities and Exchange Commission or any other Person . | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others. Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, exploitation of litigation risk imbalances, and PAEs’ investors and financing are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-16). |
| E. Patent Acquisition and Transfer Information: | | |
| 1. | For each Patent Acquired by the Firm since January 1, 2008, state whether the Firm Acquired the Patent individually or as part of a Patent Portfolio, and provide the following information: | |
| E.1.a. | For all Patents that the Firm Acquired individually, identify the Patent, and specify: | |

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| E.1.a.(1) | The Person(s) from whom the Firm Acquired the Patent and state whether that Person(s) was the original inventor. | <p>Furnishes the Commission with uniform information as to respondent’s business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, impact on innovation, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.a.(2) | The date on which the Firm Acquired the Patent. | <p>Reasonably relevant to the Commission’s determination of whether the disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.a.(3) | Whether the Patent was Acquired in bankruptcy. | <p>Furnishes the Commission with uniform information as to respondent’s business, conduct, and practices.</p> <p>Reasonably relevant to the Commission’s determination of whether exploitation of low-value patents, PAEs’ investors and financing, disclosure of PAE ownership and transparency of PAE business, treatment of F/RAND encumbered patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-12, 13-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.a.(4) | The financial terms of the Firm’s Acquisition of the Patent. As part of your response, | Furnishes the Commission with uniform information as to respondent’s business, conduct, practices, management, and relation to others. |

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| | <p>specify:</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAEs’ investors and financing, impact on innovation, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>E.1.a.(4) (a)</p> | <p>Whether the Firm paid a lump sum, the amount of the lump sum; the Person(s) to whom the lump sum was paid, and the date the payment was made.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAEs’ investors and financing, impact on innovation, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>E.1.a.(4) (b) (i) – (iv)</p> | <p>Whether the Firm paid, or is paying, an ongoing payment, and specify:</p> <p>(i) How the ongoing payment is calculated. (ii) The total amount of the ongoing payment paid as of the date of this Request. (iii) The amount of each individual payment paid as of the date of this Request, the Person(s) to whom each payment was made, and the date of each payment. (iv) The total amount of the ongoing payment expected to be paid in the future, and all Person(s) expected to receive future payments.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAEs’ investors and financing, impact on innovation, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |

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| E.1.a.(4) (c) | Whether another Person(s) contributed financially to the purchase of the Patent(s), and if so, identify the Person(s) and percentage share of ownership or other legal entitlement to the licensing or other revenue derived from such Patent(s). | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether PAEs’ investors and financing, those rewarded by PAE activity, impact on innovation, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-12, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.b. | For all Patents that the Firm Acquired as part of a Patent Portfolio, specify: | |
| E.1.b.(1) | All Patents included in the Patent Portfolio. | <p>Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.b.(2) | The Person(s) from whom the Firm Acquired the Patent Portfolio. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity, are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-15, 15-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |

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| E.1.b.(3) | The date on which the Firm Acquired the Patent Portfolio. | <p>Reasonably relevant to the Commission’s determination of whether aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-14, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.b.(4) | The circumstances in which the Firm Acquired the Patent Portfolio, including, but not limited to, whether the Patent Portfolio was acquired in bankruptcy, or whether it was acquired from the original inventor. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, PAE investors and financing, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.1.b.(5) | The financial terms of the Firm’s Acquisition of the Patent Portfolio; As part of your response, specify: | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, PAE investors and financing, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison.</p> |

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| | | (See Joint Comments, <i>supra</i> at 7, 15). |
| E.1.b.(5) (a) | Whether the Firm paid a lump sum, the amount of the lump sum; the Person(s) to whom the lump sum was paid, and the date the payment was made. | Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, PAE investors and financing, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-14, 14-17). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15). |
| E.1.b.(5) (b) | Whether the Firm paid, or is paying, an ongoing payment, and specify. | Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, aggregator activity, timing of PAE patent acquisition, PAEs’ treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, PAE investors and financing, exploitation of low-value patents, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 11-14, 14-17). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15). |
| E.1.b.(5) (b)(i)- (iv) | (i) How the ongoing payment is calculated. (ii) The total amount of the ongoing payment paid as of the date of this Request. (iii)The amount of each individual payment paid as of the date of this Request; the Person(s) to whom each payment was made; and the date of each payment. (iv)The total amount of the ongoing payment expected to be paid in the future; and all Person(s) expected to receive future payments. | Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, aggregator activity, disclosure of PAE ownership and transparency of PAE business, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-13, 14-17). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15). |
| E.1.b.(5) | Whether another Person(s) contributed | Furnishes the Commission with uniform information as to respondent’s organization, |

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| (c) | financially to the purchase of the Patent Portfolio, and if so, identify the Person(s) and percentage share of ownership or other legal entitlement to the licensing or other revenue derived from such Patent(s). | <p>business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, aggregator activity, timing of PAE patent acquisition, disclosure of PAE ownership and transparency of PAE business, exploitation of litigation risk imbalances, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.2. Identify each Patent the Firm has sold or transferred since January 1, 2008. As part of your response, specify: | | |
| E.2.a. | The Person(s) who Acquired the Patent. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-10, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.2.b. | The date(s) on which the Person(s) Acquired the Patent. | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-10, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| E.2.c. | The financial terms of the Person(s)’ | Furnishes the Commission with uniform information as to respondent’s organization, |

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| | <p>Acquisition of the Patent. As part of your response, specify:</p> | <p>business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>E.2.c.(1)</p> | <p>Whether the Person(s) paid a lump sum, the amount of the lump sum, the Person(s) to whom the lump sum was paid, and the date the payment was made.</p> | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>E.2.c.(2)</p> | <p>Whether the Person(s) paid, or is paying, an ongoing payment, and specify:</p> | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |

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| <p>E.2.c.(2) (a)-(d).</p> | <p>(a) How the ongoing payment is calculated. (b) The total amount of the ongoing payment paid as of the date of this Request. (c) The amount of each individual payment paid as of the date of this Request, the Person(s) to whom each payment was made; and the date of each payment. (d) The total amount of the ongoing payment expected to be paid in the future, and all Person(s) expected to receive future payments.</p> | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, treatment of F/RAND encumbered patents, PAE investors and financing, impact on innovation, aggregator activity and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>E.2.c.(3)</p> | <p>Whether another Person(s) contributed financially to the purchase of the Patent(s), and if so, identify the Person(s) and percentage share of ownership or other legal entitlement to the licensing or other revenue derived from such Patent(s).</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether PAE investors and financing, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, those rewarded by PAE activity, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 12-13, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>3.</p> | <p>Identify any Patent not identified in response to E.1 or E.2 for which, since January 1, 2008, the Firm has had standing to sue and submit a copy of the license agreement that grants the Firm standing to sue.</p> | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, PAE investors and financing, those rewarded by PAE activity, and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>4.</p> | <p>Submit the Patent purchase or Acquisition</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization,</p> |

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| | <p>agreement for all Acquisitions identified in response to Request E.1.</p> | <p>business, conduct, practices, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, PAE investors and financing, treatment of F/RAND encumbered patents, those rewarded by PAE activity, and timing of PAE patent acquisition are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 13-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>5.</p> | <p>Submit all documents Relating to the Firm’s Acquisitions identified in response to Request E.1, including but not limited to, market analyses, financial analyses, business plans, statements to investors and potential investors, and disclosures required by the Securities and Exchange Commission or any other Person.</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, PAE investors and financing, treatment of F/RAND encumbered patents, assertion against end-users, exploitation of low-value patents, those rewarded by PAE activity, and impact on innovation, aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-9, 11-14, 14-15, 16-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 15).</p> |
| <p>6.</p> | <p>Submit all documents Relating to the Firm’s sales and transfers identified in response to Request E.2, including but not limited to, market analyses, financial analyses, business plans statements to investors and potential investors, and disclosures required by the Securities and Exchange Commission or any other Person.</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, potential privateering activity, PAE investors and financing, treatment of F/RAND encumbered patents, those rewarded by PAE activity, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 12-14, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison.</p> |

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| | | (See Joint Comments, <i>supra</i> at 7, 15). |
| F. Patent Assertion Information: | | |
| 1. | Demand Information | |
| F.1.a. | Identify all Demands sent by, or on behalf of the Firm since January 1, 2008 and specify: | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, assertion against end-users, exploitation of low-value patents, exploitation of litigation risk imbalances, treatment of F/RAND encumbered patents, impact on start-ups and innovators, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-9, 11-14, 14-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.a.(a) | All Person(s) to which the Demand was sent. | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, assertion against end-users, exploitation of low-value patents, exploitation of litigation risk imbalances, treatment of F/RAND encumbered patents, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.a.(b) | The Patent(s) Relating to the Demand. | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, assertion against end-users, exploitation of low-value patents, exploitation of litigation risk imbalances, treatment of F/RAND encumbered patents, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |

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| F.1.a.(c) | The total time spent and costs incurred by the Firm, or any Person working on behalf of the Firm, for any research Relating to the Demand, including but not limited to any attempt to compare the allegedly infringing product(s) or process(es) with the Asserted Patent claims. | Reasonably relevant to the Commission’s determination of whether assertion against end-users, exploitation of litigation risk imbalances, exploitation of low-value patents, threat of injunctive relief and hold-up, treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-14, 15-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16). |
| F.1.a.(d) | Any Litigation initiated by the Firm Relating to the Demand, and the outcome of any such Litigation. | Reasonably relevant to the Commission’s determination of whether assertion against end-users, exploitation of litigation risk imbalances, exploitation of low-value patents, threat of injunctive relief and hold-up, scope and disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, impact on technology adoption, aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-14, 15-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 6-7, 9-10 15-16). |
| F.1.a.(e) | Any license agreement Relating to the Demand. | Reasonably relevant to the Commission’s determination of whether scope of PAE activity, assertion against end-users, exploitation of litigation risk imbalances, exploitation of low-value patents, threat of injunctive relief and hold-up, disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-13, 14-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16). |
| F.1.a.(f) | Any revenue obtained by the Firm Relating to each Demand, separately listed for each year since January 1, 2008, and for each Patent Portfolio held by the Firm. | Reasonably relevant to the Commission’s determination of whether assertion against end-users, impact on start-ups and innovators, impact on technology adoption, exploitation of litigation risk imbalances, scope of PAE activity, exploitation of low-value patents, threat of injunctive relief and hold-up, disclosure of PAE ownership and transparency of PAE |

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| | | <p>business, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.b. | <p>For each year since January 1, 2008, identify the Firm’s total expenses Relating to all Demands identified in response to Request F.1.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, disclosure of PAE ownership and transparency of PAE business, exploitation of litigation risk imbalances, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 8-10, 12-13, 14-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.c. | <p>For each year since January 1, 2008, identify the Firm’s total revenue Relating to all Demands identified in response to Request F.1.</p> | <p>Reasonably relevant to the Commission’s determination of whether rewarded by PAE activity, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, scope of PAE activity, disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, impact on technology adoption, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 8-11, 12-13, 14-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.d. | <p>Submit a copy of each Demand identified in response to Request F.1, and all documents reflecting communications Relating the Demand.</p> | <p>Reasonably relevant to the Commission’s determination of whether assertion against end-users, exploitation of litigation risk imbalances, scope of PAE activity, exploitation of low-value patents, treatment of F/RAND encumbered patents, threat of injunctive relief and hold-up, impact on start-ups and innovators, impact on technology adoption, and disclosure of PAE ownership and transparency of PAE business are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-12, 13-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |

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| F.1.e. | Submit all documents that reflect business strategy or financial research Relating to the Demand(s) identified in response to Request 6.A. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, and management.</p> <p>Reasonably relevant to the Commission’s determination of whether PAE investors and financing, aggregator activity, potential privateering activity, exploitation of low-value patents, threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, disclosure of PAE ownership and transparency of PAE business, assertion against end-users, impact on technology adoption, and treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 9-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.1.f. | Submit all license or settlement agreements Relating to the Demand. | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, assertion against end-users, threat of injunctive relief and hold-up, aggregator activity, scope of PAE activity, impact on technology adoption, treatment of F/RAND encumbered patents, exploitation of low-value patents, and disclosure of PAE ownership and transparency of PAE business are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 9-12, 13-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 10, 16).</p> |
| F.2. | Litigation Information: | |
| F.2.a. | Identify all Litigation(s) pending since January 1, 2008 to which the Firm is a party involving any Patent(s) held by the Firm since January 1, 2008. As part of your response, specify: | Reasonably relevant to the Commission’s determination of whether scope of PAE activity, costs to operating companies and competition, exploitation of litigation risk imbalances, assertion against end-users, exploitation of low-value patents, threat of injunctive relief and hold-up, disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-9, 11-16, 19-20). |

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| | | Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(1) | Whether the Firm is a plaintiff or defendant in the Litigation. | Reasonably relevant to the Commission’s determination of whether scope of PAE activity, costs to operating companies and competition, exploitation of litigation risk imbalances, assertion against end-users, exploitation of low-value patents, threat of injunctive relief and hold-up, disclosure of PAE ownership and transparency of PAE business, impact on start-ups and innovators, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-9, 11-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(2) | The Patent(s) and claim(s) Asserted. | Reasonably relevant to the Commission’s determination of whether exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, costs to operating companies and competition, aggregator activity, disclosure of PAE ownership and transparency of PAE business, treatment of F/RAND encumbered patents, and scope of PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-8, 11-16). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(3) | The court, date filed, docket number, parties, current or final status (including dates). | Reasonably relevant to the Commission’s determination of whether scope of PAE activity, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, costs to operating companies and competition, assertion against end-users, exploitation of low-value patents, and potential privateering activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-8, 11-12, 14, 15-17, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(4) | The remedies sought in the Litigation, | Reasonably relevant to the Commission’s determination of whether threat of injunctive |

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| | including, but not limited to damages, enhanced damages, injunctive relief, or an exclusion order. | <p>relief and hold-up, exploitation of litigation risk imbalances, exploitation of low-value patents, costs to operating companies and competition, scope of PAE activity, impact on start-ups and innovators, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-9, 11-14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.2.a.(5) | Whether the Patent was found infringed, invalid, or unenforceable and whether an injunction or an exclusion order issued. | <p>Reasonably relevant to the Commission’s determination of whether exploitation of low-value patents, threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, scope of PAE activity, costs to operating companies and competition, impact on start-ups and innovators, and treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-9, 11-12, 13-14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.2.a.(6) | Whether past damages were awarded and the amount of any such award. | <p>Reasonably relevant to the Commission’s determination of whether the exploitation of litigation risk imbalances, exploitation of low-value patents, threat of injunctive relief and hold-up, and impact on start-ups and innovators are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 8-9, 11-12, 14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.2.a.(7) | whether future damages were awarded, and all projected revenue expected by the Firm as a result of the award for future damages, by year, together with the method for calculating future damages (e.g. as a fraction of revenue or a fee per unit sold) | <p>Reasonably relevant to the Commission’s determination of whether scope of PAE activity, costs to operating companies and competition, impact on start-ups and innovators, exploitation of litigation risk imbalances, and treatment of F/RAND encumbered patents are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-9, 11, 13-14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison.</p> |

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| | | (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(8) | If the Litigation resulted in a settlement agreement, provide a copy of that agreement and specify: | |
| F.2.a.(8) (a) | The stage of Litigation at which settlement was reached, e.g. before an order on a motion to dismiss, before an order on a motion for summary judgment. | Reasonably relevant to the Commission’s determination of whether threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, costs to operating companies and competition, impact on technology adoption, impact on start-ups and innovators, assertion against end-users, exploitation of low-value patents, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-10, 11-14, 15-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(8) (b) | Whether the Court issued an order construing any claim(s) of the Patent(s) Asserted before settlement was reached. | Reasonably relevant to the Commission’s determination of whether exploitation of low-value patents, threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, costs to operating companies and competition, impact on technology adoption, impact on start-ups and innovators, assertion against end-users, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-10, 11-14, 15-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(8) (c) | The terms of the settlement agreement, and if the settlement included a license or cross-license, all licensing information requested in Request F.3. | Reasonably relevant to the Commission’s determination of whether impact on technology adoption, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, costs to operating companies and competition, impact on start-ups and innovators, treatment of F/RAND encumbered patents, and disclosure of PAE patent ownership and PAE transparency are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-10, 13-16). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.a.(9) | For each year since January 1, 2008, the costs | Reasonably relevant to the Commission’s determination of whether exploitation of |

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| | the Firm incurred for the Litigation. | litigation risk imbalances, those rewarded by PAE activity, costs to operating companies and competition, impact on technology adoption, impact on start-ups and innovators, assertion against end-users, exploitation of low-value patents, treatment of F/RAND encumbered patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-10, 11-14, 15-16, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.b. | For each Litigation identified in Response to Request F.2, submit all orders Relating to disposition of any dispositive motions. | Reasonably relevant to the Commission’s determination of whether exploitation of low-value patents, exploitation of litigation risk imbalances, and those rewarded by PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-12, 15-16). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.c. | State whether the Firm has any contingency fee agreement(s) Relating to any Litigation(s) identified in response to Request F.2; and specify: | Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, and management. Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, costs to operating companies and competition, exploitation of litigation risk imbalances, exploitation of low-value patents, potential privateering activity, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 14-17). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.2.c (1)-(4). | (1) The Person(s) with whom the Firm shares the contingency fee agreement(s). (2) How the contingency fee is calculated. (3) For each year since January 1, 2008, the amount paid pursuant to the contingency | Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, those rewarded by PAE activity, exploitation of litigation risk imbalances, exploitation of low-value patents, potential privateering activity, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 14-17). |

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| | <p>fee arrangement.</p> <p>(4) Submit a copy of the contingency fee agreement(s).</p> | <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3. | License Information: | |
| F.3.a. | <p>Identify all license agreements the Firm entered into with any other Person(s) since January 1, 2008 Relating to any Patent(s) held by the Firm since January 1, 2008. As part of your response, specify:</p> | <p>Furnishes the Commission with uniform information as to respondent’s business, conduct, practices, and management.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, aggregator activity, exploitation of low-value patents, treatment of F/RAND encumbered patents, those rewarded by PAE activity, exploitation of litigation risk imbalances, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 13-14, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a. (1)-(3). | <p>(1) The Patent(s) licensed.</p> <p>(2) The date and length of the license agreement.</p> <p>(3) The licensor(s) and licensee(s).</p> | <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, aggregator activity, exploitation of low-value patents, treatment of F/RAND encumbered patents, those rewarded by PAE activity, exploitation of litigation risk imbalances, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 13-14, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(4) | <p>Whether the license agreement Relates to any Litigation. As part of your response:</p> | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, exploitation of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, treatment of F/RAND encumbered patents, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-17, 19-20).</p> |

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| | | Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.3.a.(4) (a) | Identify the Litigation to which the license agreement Relates. | Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, exploitation of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, treatment of F/RAND encumbered patents, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-17, 18-19). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.3.a.(4) (b) | For license agreements Relating to any Litigation, state when settlement was reached and when the license agreement was executed, e.g. after an order on a dispositive motion, on the eve of trial. | Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, exploitation of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, treatment of F/RAND encumbered patents, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-17, 19-20). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.3.a.(4) (c) | State whether the Court issued an order construing any claim(s) of the Patent(s) Asserted before the license agreement was executed. | Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, exploitation of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, treatment of F/RAND encumbered patents, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 11-17, 18-19). Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |

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| F.3.a.(5) | All revenue obtained by the Firm Relating to each license agreement, separately listed for each year since January 1, 2008, and for each Patent Portfolio held by the Firm; and specify: | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, exploitation of low-value patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, treatment of F/RAND encumbered patents, potential privateering activity, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 9-10, 14, 11-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(5) (a) | The effective royalty rate and the base to which it is to be Applied. | <p>Reasonably relevant to the Commission’s determination of whether threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, exploitation of low-value patents, treatment of F/RAND encumbered patents, disclosure of PAE ownership and transparency of PAE business, aggregator activity, impact on technology adoption, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 9-10, 14, 11-16, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(5) (b) | State whether this revenue was shared with any Person. | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(5) (c) | Identify the Person and the revenue shared. | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 14-15, 16-17).</p> |

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| | | Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16). |
| F.3.a.(5) (d) | Submit the revenue sharing agreement(s). | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether disclosure of PAE ownership and transparency of PAE business, those rewarded by PAE activity, PAE investors and financing, potential privateering activity, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 9-10, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(6) | All projected revenue expected by the Firm as a result of the license agreement, by year, and the method for calculating the projected revenue, e.g. as a fraction of revenue or a fee per unit sold. | <p>Reasonably relevant to the Commission’s determination of whether the costs to operating companies, impact on technology adoption, threat of injunctive relief and hold-up, exploitation of litigation risk imbalances, PAE investors and financing, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, aggregator activity, and those rewarded by PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-11, 12-13, 14-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(7) | Whether the license agreement includes any cross-license, and submit a copy of the cross-license. | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, the costs to operating companies, impact on technology adoption, threat of injunctive relief and hold-up, exploitation of low-value patents, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-8, 9-10, 11-13, 14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |

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| F.3.a.(8) | Whether the Firm conducted a valuation of the cross-license, and submit all documents Relating to the valuation. | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, the costs to operating companies, impact on technology adoption, threat of injunctive relief and hold-up, and aggregator activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-8, 9-10, 12-13, 14, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| F.3.a.(9) | Whether the license agreement includes any provisions for technology adoption from the Firm to the licensee(s). | <p>Reasonably relevant to the Commission’s determination of whether impact on technology adoption, exploitation of litigation risk imbalances, exploitation of low-value patents, and costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 7-8, 9-10, 11-12, 15-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| 4. | For each license agreement identified in Response to Request F.3, submit a copy of the agreement and all documents Relating to the agreement, including but not limited to, documents reflecting communications Relating to the license, documents summarizing sales made by the licensee, and documents reflecting arrangements to share revenue generated by the license. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, the costs to operating companies, impact on technology adoption, PAE investors and financing, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, treatment of F/RAND encumbered patents, aggregator activity, and those rewarded by PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-16).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| 5. | Submit all documents Relating to the Firm’s | Furnishes the Commission with uniform information as to respondent’s organization, |

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| | rationale for all Assertions identified in response to Request F, including but not limited to, market analyses, financial analyses, business plans, statements to investors and potential investors, and disclosures required by the Securities and Exchange Commission or any other Person. | <p>business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether PAE investors and financing, aggregator activity, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, the costs to operating companies, exploitation of low-value patents, threat of injunctive relief and hold-up, assertions against end-users, and those rewarded by PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-15, 16-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| 6. | Submit all documents Relating to the Firm’s projected gross revenue or return-on investment for all Assertions identified in response to Request F, including, but not limited to, market analyses, financial analyses, business plans, statements to investors and potential investors, and disclosures required by the Securities and Exchange Commission or any other Person. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether PAE investors and financing, aggregator activity, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, the costs to operating companies, exploitation of low-value patents, threat of injunctive relief and hold-up, assertions against end-users, and those rewarded by PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-15, 16-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8, 10, 16).</p> |
| G. Aggregate Cost Information: | | |
| 1. | For each year since January 1, 2008, identify: | |
| G.1.a. | The total cost to and amount paid by the Firm Relating to all Acquisitions identified in response to Request E.1. State whether the Firm shares any fraction of this cost with any Person(s), and if the answer is yes, specify: | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator</p> |

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| | | <p>activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, the costs to operating companies, exploitation of low-value patents, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-13, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.a. (1)-(4) | <p>(1) The Person(s) with whom costs are shared.</p> <p>(2) How this amount is calculated.</p> <p>(3) The total cost shared to date.</p> <p>(4) Any cost expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, the costs to operating companies, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-11, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.b. | <p>The total cost to and amount paid by the Firm Relating to all Assertions identified in response to Request F, and specify:</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, the costs to operating companies, assertion against end-users, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.b. (1) | <p>The total cost to and amount paid by the Firm Relating to all Demands identified in response to Request F.1. State whether the Firm shares any fraction of this cost with any Person(s), and if the answer is yes, specify:</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator</p> |

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| | | <p>activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, the costs to operating companies, assertion against end-users, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.b. (1) (a)- (d) | <p>(a) The Person(s) with whom costs are shared.</p> <p>(b) How this amount is calculated.</p> <p>(c) The total cost shared to date.</p> <p>(d) Any cost expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, the costs to operating companies, assertion against end-users, and impact on technology adoption are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 9-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.b. (2) | <p>The total cost to and amount paid by the Firm Relating to all Litigations identified in response to Request F.2. State whether the Firm shares any fraction of this cost with any Person(s), and if the answer is yes, specify:</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, and the costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| G.1.b. | (a) The Person(s) with whom costs are | Reasonably relevant to the Commission’s determination of whether exploitation of |

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| <p>(2)(a)- (d)</p> | <p>shared. (b) How this amount is calculated. (c) The total cost shared to date. (d) Any cost expected to be shared in the future.</p> | <p>litigation risk imbalances, threat of injunctive relief and hold-up, those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, and the costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>G.1.b. (3)</p> | <p>The total cost to and amount paid by the Firm Relating to all License Agreements identified in response to Request F.3. State whether the Firm shares any fraction of this cost with any Person(s), and if the answer is yes, specify:</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, and the costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>G.1.b. (3)(a)- (d)</p> | <p>(a) The Person(s) with whom costs are shared. (b) How this amount is calculated. (c) The total cost shared to date. (d) Any cost expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, and the costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>G.2</p> | <p>Submit all documents Relating to all costs and payments identified in response to</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> |

Appendix A: Support For Relevance of Each Request in the FTC’s 6(b) Order

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| | Request G. | <p>Reasonably relevant to the Commission’s determination of whether PAE investors and financing, those rewarded by PAE activity, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, exploitation of litigation risk imbalances, scope of PAE activity, exploitation of low-value patents, and the costs to operating companies are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H. Aggregate Revenue Information: | | |
| 1. | For each year since January 1, 2008, identify: | |
| H.1.a. | The total revenue received by the Firm Relating to all transfers identified in response to Request E.2. State whether the Firm shares any fraction of this revenue with any Person(s), and if the answer is yes, specify: | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, and threat of injunctive relief and hold-up are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.a. (1)-(4) | <p>(1) The Person(s) with whom revenue are shared.</p> <p>(2) How this amount is calculated.</p> <p>(3) The total revenue shared to date.</p> <p>(4) Any revenue expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, and threat of injunctive relief and hold-up are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11-13, 14-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.b. | The total revenue received by the Firm | Reasonably relevant to the Commission’s determination of whether those rewarded by |

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| | <p>Relating to all Assertions identified in response to Request F, and specify:</p> | <p>PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, cost to operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.b. (1) | <p>The total revenue received by the Firm Relating to all Demands identified in response to Request F.1. State whether the Firm shares any fraction of this revenue with any Person(s), and if the answer is yes, specify:</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, cost to operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.b. (1) (a)- (d) | <p>(a) The Person(s) with whom revenue are shared. (b) How this amount is calculated. (c) The total revenue shared to date. (d) Any revenue expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, cost to operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-13, 14-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.b. (2) | <p>The total revenue received by the Firm Relating to all Litigations identified in</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, disclosure of</p> |

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| | <p>response to Request F.2. State whether the Firm shares any fraction of this revenue with any Person(s), and if the answer is yes, specify:</p> | <p>PAE ownership and transparency of PAE business, cost to operating companies, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances and threat of injunctive relief and hold-up are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-12, 13-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>H.1.b. (2) (a)- (d)</p> | <p>(a) The Person(s) with whom revenue are shared. (b) How this amount is calculated. (c) The total revenue shared to date. (d) Any revenue expected to be shared in the future.</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, disclosure of PAE ownership and transparency of PAE business, cost to operating companies, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances and threat of injunctive relief and hold-up are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-12, 13-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>H.1.b. (3)</p> | <p>The total revenue received by the Firm Relating to all License Agreements identified in response to Request F.3. State whether the Firm shares any fraction of this revenue with any Person(s), and if the answer is yes, specify:</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, treatment of F/RAND encumbered patents, cost to operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| <p>H.1.b. (3)(a)- (d)</p> | <p>(a) The Person(s) with whom revenue are shared. (b) How this amount is calculated. (c) The total revenue shared to date. (d) Any revenue expected to be shared in the</p> | <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, treatment of F/RAND encumbered patents, cost to</p> |

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| | future. | <p>operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.1.b. (4) | Any revenue not identified above, shared with any Person(s) and specify: | |
| H.1.b. (4) (a)- (d). | <p>(a) The Person(s) with whom revenue are shared.</p> <p>(b) How this amount is calculated.</p> <p>(c) The total revenue shared to date.</p> <p>(d) Any revenue expected to be shared in the future.</p> | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, and scope of PAE activity are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-7, 11, 12-13, 14-15, 16-17).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |
| H.2. | Submit all documents Relating to all revenue identified in response to Request 8. | <p>Furnishes the Commission with uniform information as to respondent’s organization, business, conduct, practices, management, and relation to others.</p> <p>Reasonably relevant to the Commission’s determination of whether those rewarded by PAE activity, PAE investors and financing, potential privateering activity, aggregator activity, disclosure of PAE ownership and transparency of PAE business, scope of PAE activity, exploitation of low-value patents, exploitation of litigation risk imbalances, threat of injunctive relief and hold-up, treatment of F/RAND encumbered patents, cost to operating companies, and assertion against end-users are consistent with the law and public interest. (See Joint Comments, <i>supra</i> at pages 6-8, 11-17, 19-20).</p> <p>Reasonably relevant for the manufacturing respondents to establish a control comparison. (See Joint Comments, <i>supra</i> at 7, 8).</p> |