

Request No. 7: All documents and things which describe, refer to, discuss, or relate to the conception and/or reduction to practice of any invention of the patent in this lawsuit, including without limitation, any invention disclosures given to anyone, any prototypes of any such invention, and any testing of any such invention.

RESPONSE:

Request No. 8: All documents and things which describe, refer to, discuss, or relate to any product or entity which Heartland has ever a.) examined to determine if it infringes upon the patent in this lawsuit, or b.) accused of infringing upon the patent in this lawsuit.

RESPONSE:

Request No. 9: To the extent not otherwise requested herein, all documents and things which describe, refer to, discuss, or relate to any investigation by or on behalf of Heartland into the patentability of the invention(s) of the patent in this lawsuit or the validity of the patent in this lawsuit, including the identity of any prior art which is "material" to the claims of the patents in this lawsuit, as that term is meant in 37 C.F.R. §1.56.

RESPONSE:

Request No. 10: If, during prosecution of the patent application for the patent in this lawsuit or of any other patent application identified in response to Request No. 1, Heartland contended that any of the claims were not "obvious" within the meaning of 35 U.S.C. §103, then produce the documents and things sufficient to show both Heartland's factual basis for determining the "level of ordinary