

Ryan Fountain

From: John LaDue [JLaDue@LCK-Law.com]
Sent: Thursday, January 14, 2010 3:09 PM
To: Ryan Fountain
Subject: RE: Heartland v. Forest River
Attachments: Stant v. Gerdes Protective Order.pdf; Stant v. Gerdes Docket.PDF; Stant v. Gerdes Order on Ineq. Conduct Claim.pdf; Stant v. Gerdes Jury Verdict.pdf

Ryan:

Here's what I can tell you about Jay Taylor's Expert Report in the Stant case. It was marked "HIGHLY CONFIDENTIAL" under the terms of the attached Protective Order, so, B&T cannot provide a copy in response to your request. Reviewing the docket, also attached, it appears that all of the Summary Judgment briefing on the issue of inequitable conduct was filed "Under Seal." See, docket entries: 183, 185, 201, 230, 270, and 202. There was also some post-trial briefing on the issue and an order (see docket entries 505-510), but this briefing appears to have been based on trial testimony and not on expert reports.

I am still working on the other items that we discussed on the phone.

John

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From: Ryan Fountain [mailto:attorney@ryanfountain.com]
Sent: Thursday, January 14, 2010 8:31 AM
To: John LaDue
Subject: Heartland v. Forest River

John,

To confirm and follow up on our recent telephone discussions, have you received the documentation we discussed about Jay Taylor's prior Expert Report against Barnes & Thornburg so that we can address whatever protective order is in place concerning that? Also, have you received as yet any documents relating to departmental policies about information to be given to inventors and prospective patentees? And finally, do you have any dates of availability for finishing the depositions of Gerry and Greg?

I will not be in the office much today, but I would appreciate at least a quick email letting me know where we are on these matters. Thanks,

Ryan

1/31/2010