III. <u>Patent Disclosures</u>

3.4. Document Production Accompanying Initial Noninfringement Contentions.

With its Noninfringement Contentions, the party opposing a claim of patent infringement shall produce or make available for inspection and copying:

- (a) Documents sufficient to support the statement(s) made in the chart required by L. P. R. 3.3(a);
- (b) Document sufficient to evidence the actual parties that make and sell the Accused Instrumentality or any other documents sufficient to support the statement(s) made in response to L. P. R. 3.3(b); and
- (c) Documents sufficient to describe the structure, composition, and/or operation of the Accused Instrumentality.