

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INARI MEDICAL, INC., A DELAWARE
CORPORATION,

Plaintiff,

v.

INQUIS MEDICAL, INC., A DELAWARE
CORPORATION,

Defendant.

C.A. No. 24-1023-CFC-EGT

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Inari Medical, Inc. (“Inari”) respectfully moves this Court to schedule a teleconference to address an outstanding dispute regarding the following discovery matter:

- Whether Inari’s litigation counsel may have access to, and use for this case, certain materials already compiled by a third-party forensic investigator related to Inari’s claims at issue.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on the following date: January 17, 12 minutes. The parties have also corresponded at length on that issue since September 17, 2024.

Plaintiff’s Counsel:

Delaware Counsel: Kelly Farnan

Lead Counsel: Christina Rayburn, Jimmy Biblarz

Defendant’s Counsel:

Delaware Counsel: Pilar Kraman, Jennifer Siew

Lead Counsel: Gavin Frisch, Nathan Sun

The parties are available for a teleconference on the following dates: February 18, 19, or 20, 2025.

This dispute is the first time that a discovery or protective order dispute has been brought before the Court.¹

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Counsel for Plaintiff Inari Medical, Inc.

Dated: January 23, 2025

¹ Defendant Inquis Medical, Inc. has filed a motion to stay discovery, but has taken the position that that is not a filing subject to procedures for discovery disputes.