

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

INARI MEDICAL, INC.,	)	
	)	
Plaintiff,	)	C.A. No. 24-1023-CFC-EGT
	)	
v.	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
INQUIS MEDICAL, INC.,	)	
	)	
Defendant.	)	

**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.

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 following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in another verbal meet-and-confer (by telephone) on the following date: January 28, 19 minutes.

Plaintiff's Counsel:

Delaware Counsel: Kelly Farnan

Lead Counsel: Christina Rayburn

Defendant's Counsel:

Delaware Counsel: Jennifer Siew

Lead Counsel: Gavin Frisch, Nathan Sun

The parties have also exchanged extensive correspondence on this issue.

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.<sup>1</sup>

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<sup>1</sup> 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.

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Dated: January 29, 2025