

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROBERT BOSCH LLC, and
MERCEDES-BENZ USA, LLC,
Petitioner,

V.

WESTPORT FUEL SYSTEMS CANADA INC.,
Patent Owner.

IPR2023-00292, IPR2023-00293
U.S. Patent No. 6,298,829 B1

Deposition of HEIKE HOLTHAUS
Conducted Virtually
Tuesday, July 16, 2024
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Reported By: Karen Klerekoper, CSR-4250, RPR

1 Deposition of HEIKE HOLTHAUS, conducted
2 virtually:
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9 Pursuant to Notice, before Karen Klerekoper,
10 Notary Public in and for the State of Michigan.
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A P P E A R A N C E S

ON BEHALF OF THE PETITIONER ROBERT BOSCH, LLC:

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ON BEHALF OF THE PATENT OWNER:

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ALSO PRESENT:

ZOOM TECHNICIAN NIKA MCKAGEN, PLANET DEPOS

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HEIKE HOLTHAUS

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EXHIBIT:

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(Exhibits attached to the transcript.)

Exhibits 1005 and 1006, Klugl/translation

7

Exhibit 2026, declaration on behalf of Lango

8

Exhibit 1025, entry in the translator

17

platform, ProZ

1 P R O C E E D I N G S

2 (Oath stipulation read and agreed by counsel
3 and witness.)

4 HEIKE HOLTHAUS, having been duly sworn
5 testified as follows:

6 EXAMINATION

7 BY MR. HERMAN:

8 Q Okay. This is Patrick Herman for counsel
9 for petitioner, and we are here today in
10 connection with two IPR proceedings. The first is
11 IPR2023-00292, and the second is IPR2023-00293,
12 both encaptioned Robert Bosch LLC, et al., versus
13 Westport Fuel Systems Canada, Inc.

14 MR. HIGER: My name is David Higer. I'm
15 here. I represent patent owner Westport Fuel
16 Systems Canada, Inc., in both of the IPR
17 proceedings referenced, as well as the witness
18 here today.

19 Q Good morning, Ms. Holthaus. Did I say
20 your name properly there?

21 A Yes, you did.

22 Q Have you been deposed before?

1 A No.

2 Q So, given that this is your first time,
3 I'm going to go through a few basic ground rules
4 in the hopes that things will go smoothly today.

5 And the first is that, as you have heard,
6 there is a court reporter. So, it's important
7 that you respond verbally to my questions so that
8 the court reporter can record your testimony.

9 Is that okay?

10 A That's okay.

11 Q And it's also important that we do not
12 talk over each other so that there is a clear
13 written record. And I'll do my best to wait for
14 you to finish answering before asking another
15 question. And I also ask that you wait until I'm
16 done with my questions before answering, you know,
17 both so we don't overlap and to give your attorney
18 time to object, if he sees so fit.

19 Is that okay?

20 A Eventually.

21 Q And you're also entitled to a question you
22 understand. So, if anything I ask is unclear,

1 please let me know. Otherwise, I'll assume that
2 we're on the same page.

3 That is okay?

4 A That is okay.

5 Q Next I ask that you not look at anything
6 during your deposition besides the documents that
7 I give you. And if you do look at anything, I ask
8 that you tell me.

9 Is that okay?

10 A Yes.

11 MR. HIGER: And, Counsel, I will just
12 state for the record on that front, she has copies
13 of Exhibits 1005, 1006, and 2026 paper copies
14 available to her. So, those are there. So, if
15 she is referencing something, you can ask her what
16 she's referencing there, but that's the only paper
17 that is with her now.

18 MR. HERMAN: Sure.

19 (Marked for identification Exhibits 1005
20 and 1006, Klugl/translation.)

21 Q And why don't, to start things off, I will
22 give you electronic copies of those three

1 documents, and you can refer to whichever you
2 would prefer. And you can look at the paper
3 copies, if you prefer to look at the paper copies
4 or the electronic copies that I'm now going to put
5 into the chat.

6 A Okay. Thank you.

7 Q Just give me a moment.

8 Okay. Now, Ms. Holthaus, is there
9 anything that would interfere or prevent you to be
10 able to testify today?

11 A Not that I'm aware of.

12 Q Okay. Now, you have both a paper copy of
13 Exhibit 2026, and there should be an electronic
14 copy of that same exhibit in the chat. If you
15 could get that in front of you, please.

16 A Yes, I have it, paper copy.

17 Q And do you recognize Exhibit 2026?

18 A I do.

19 (Marked for identification Exhibit 2026,
20 declaration on behalf of Lango.)

21 Q What is that?

22 A It is a declaration that I signed on

1 behalf of the company Lango.

2 Q Now, if you could turn to the final page,
3 the last page of the Exhibit 2026.

4 A Yes, I'm there.

5 Q And your signature appears there, right?

6 A Yes.

7 Q Sorry, I missed your answer. Can you
8 repeat that?

9 A Yes.

10 Q And it's dated April 26th, 2024?

11 A That is correct.

12 Q Do you know approximately when you began
13 work in connection with this declaration?

14 A I do not recall.

15 MR. HIGER: I'm going to caution you,
16 don't get into any of our conversations or
17 anything specifically around the declaration,
18 other than the declaration itself --

19 A Yes.

20 MR. HIGER: -- in response to the
21 question.

22 A I do not recall.

1 Q Could you estimate what month it was?

2 MR. HIGER: Same caution.

3 A No, I can't.

4 Q Do you think it was at least by February
5 of 2024?

6 MR. HIGER: Objection, speculation. Same
7 caution.

8 A Again, I cannot recall.

9 Q Okay. Now, if you turn back to
10 paragraph 3 of the declaration, which is on the
11 first page.

12 A Yes.

13 Q You reference an Exhibit 1005, which is a
14 German patent with the number DE 197 08 304 A1.

15 Do you see that?

16 A Yes.

17 Q And you also reference an Exhibit 1006,
18 which is an English translation of the same
19 patent.

20 A Yes.

21 Q And those are two things that you reviewed
22 and relied on in authoring your declaration; is

1 that right?

2 A Yes.

3 Q Now, would it be okay for purposes of the
4 deposition today if I refer to the German patent
5 as Klugl?

6 A Yes.

7 Q And would it be okay if I refer to the
8 English translation as the Klugl translation?

9 A Yes.

10 Q Now, you don't cite anything else in your
11 declaration besides Exhibit 1005 and Exhibit 1006;
12 is that right?

13 A That is correct.

14 Q So, did you rely on anything else besides
15 those two exhibits in arriving at your opinions?

16 A No.

17 Q Did you communicate with anyone besides
18 counsel for patent owner regarding the subject
19 matter of your declaration?

20 A No.

21 Q Now, if you turn back to paragraph 3, in
22 paragraph 3, you note that you have evaluated the

1 accuracy of passages of the English translation,
2 Exhibit 1006, of German patent DE19708304A1,
3 Exhibit 1005, namely the paragraph appearing at
4 column 1, lines 42 to 49, and column 7, lines 8 to
5 19, of Exhibit 1005.

6 Do you see that in paragraph 3?

7 A I do.

8 Q So, here you're expressing that your
9 opinions are limited to the accuracy of the
10 translation of two paragraphs in Klugl, one that
11 appears in column 1 and another that appears in
12 column 7, correct?

13 A Yes.

14 Q So, you're not, however, offering an
15 opinion on the accuracy of any other passages in
16 Klugl, correct?

17 A I did not offer any opinion, no.

18 Q And you have not generated your own
19 translated version of Klugl in this proceeding,
20 correct?

21 A No, I have not.

22 Q Nor have you generated what you would

1 consider to be an accurate translation of the two
2 paragraphs you reference here in paragraph 3 of
3 your declaration, correct?

4 A That is correct.

5 Q Now, if you turn to the next page of your
6 declaration, page 2 and paragraph 4 at the
7 beginning of page 2, you discuss translation of
8 one particular word in Klugl. And I believe that
9 is said hububersetzung. Did I get that right?

10 A It would be hub bersetung.

11 Q Hububersetzung. I do not speak German, so
12 I will do my best to remember that.
13 Hububersetzung.

14 So, in paragraph 4 through 7 of your
15 declaration, you discuss the translation of
16 hububerseztung in Klugl, correct?

17 A Correct.

18 Q And in paragraph 4, you note that
19 hububersetzung is used four times in Klugl?

20 A In those paragraphs stated, yes.

21 Q So, used four times in the two paragraphs
22 you referenced in paragraph 3 of your declaration,

1 correct?

2 A (Inaudible.)

3 Q Do you need me to repeat the question?

4 A Oh, I'm sorry, I was not loud enough,
5 correct.

6 Q Okay. And in paragraph 5, you note that
7 in Exhibit 1006, that's the Klugl translation,
8 hububersetzung was translated using various words,
9 including stroke translation, stroke ratio, and
10 stroke transmission; is that right?

11 A That is what I state, yes.

12 Q All right. And in paragraph 7 you state
13 that the word "hububersetzung" in Exhibit 1005,
14 that's Klugl, should be translated the same all
15 four places in which it appears.

16 Do you see that?

17 A Yes, I do.

18 Q So, that is why you're saying, in your
19 view, that there was a translation error, because
20 hububersetzung was not translated using the same
21 words in all four places in which it appears in
22 Klugl, correct?

1 A That is correct.

2 Q Now, in this declaration, you do not
3 express an opinion regarding whether or not
4 hububersetzung means stroke translation, stroke
5 ratio, stroke transmission, or something else, do
6 you?

7 A No, I don't express an opinion on the
8 final translation or what would be the single term
9 that should have been used.

10 Q So, for example, you do not take the
11 position that the German term "hububersetzung"
12 cannot be properly translated to mean stroke
13 ratio, correct?

14 A Can you repeat that, please?

15 Q So, in this declaration, Exhibit 2026, you
16 do not take the position that the German term
17 "hububersetzung" cannot be properly translated to
18 mean stroke ratio, correct? That position is not
19 in this declaration?

20 A I cannot answer it in that way, because my
21 work was to determine whether it should have been
22 translated as one single term, and I have

1 undertaken the work to determine that.

2 But I have not undertaken which of the
3 terms or any other should have been the single
4 term used.

5 Q So, in your declaration, you don't cite
6 any other documents that define your otherwise
7 provide insight into what hububersetzung means,
8 correct?

9 A No, I don't -- do not state anything about
10 the meaning of hububersetzung in my declaration.

11 Q All right. So, prior to authoring this
12 declaration, did you regularly use the term
13 "hububersetzung"?

14 A I have used or have been familiar with the
15 term "hububerseztung," yes.

16 Q Have you ever translated that term before?

17 A I do not recall.

18 Q So, prior to authoring this declaration,
19 you did have a pre-existing understanding of what
20 the term "hububersetzung" means?

21 A Yes.

22 Q And what was that?

1 A Spontaneously when I read the -- the
2 German version of these paragraphs, spontaneously
3 I was thinking of stroke translation.

4 Q So, I'm going to put another exhibit into
5 the chat here. And this one has been premarked as
6 Petitioner Exhibit 1025.

7 (Marked for identification Exhibit 1025,
8 entry in the translator platform, ProZ.)

9 Q If you could open that up for me.

10 A Let me see if I can do that for you. I'm
11 sorry, I don't know how to open that document.

12 Q Did it arrive over the chat?

13 MR. HIGER: It did arrive. Let me -- I'm
14 trying to get it open, too. So, let me -- if I
15 can get it open, then I can assist her to get it
16 open.

17 She has the document up.

18 Q So, do you recognize Exhibit 1025,
19 Ms. Holthaus?

20 A Yes, I do.

21 Q So, what is this?

22 A That is an entry in the translator

1 platform, ProZ.

2 Q So, ProZ is a translator platform, that's
3 what you just said?

4 A Yes, it is.

5 Q And what do you mean by that?

6 A It is a platform where translators can
7 look for work or where they can ask questions.

8 Q So, do translators often employ this
9 particular platform?

10 A I cannot speak to how often they do that,
11 but it's -- it's -- it can be part of a
12 translator's workflow.

13 Q And you use this platform, presumably?

14 A Yes.

15 Q Both to look for work and to ask questions
16 about translations?

17 A Yes.

18 Q And you have done it in addition to the
19 one instance we're looking at in Exhibit 1025, you
20 have done it before; is that true?

21 A Yes.

22 Q How often do you post to this particular

1 platform?

2 A Oh, I -- I -- I don't recall that. It's
3 not that very often these days.

4 Q Do you often respond to others' posts on
5 this platform?

6 A Not very often.

7 Q Now, if you look at the first page of
8 Exhibit 1025, it appears that the post is dated
9 February 22nd of this year.

10 Do you see that?

11 A Yes, I see that.

12 Q And the post is entitled -- sorry, I've
13 completely forgotten how to pronounce that --
14 hububersetzung. Did I get it right that time?

15 A Yes, that's close.

16 Q And the post is entitled: Hububersetzung.

17 Correct?

18 A Correct.

19 Q And the post identifies -- appears to
20 be -- identifies you, appears to be, as the
21 poster; is that correct?

22 A Correct.

1 Q And there's a picture of you at the top of
2 the post, true?

3 A Correct.

4 Q Can you confirm that you authored this
5 post on or around February 22nd of this year?

6 A Yes.

7 Q And that is before you signed the
8 declaration that we looked at previously?

9 A Yes.

10 Q Did you post this after beginning work on
11 this particular declaration?

12 MR. HIGER: And I'm now going to caution
13 the witness on the basis of privilege. Do not get
14 into anything that you may have done on behalf of
15 the attorneys that is unrelated to this
16 declaration. You can speak about the particular
17 document in front of you, but do not get into work
18 that you were performing on our behalf unrelated
19 to the declaration.

20 A I will adhere to counsel's advice.

21 Q So, I'm not looking for information about
22 your interactions with counsel. I'm looking more

1 for kind of a timing question. So, did you post
2 this in a period of time after which you had
3 already started work on the declaration?

4 MR. HIGER: Same caution.

5 A Same answer.

6 Q So, you are unable to answer that question
7 without revealing attorney-client privileged
8 information; is that your position?

9 A That is my position.

10 Q Now, this post starts with a paragraph of
11 German text. Do you see that?

12 A Yes, I do.

13 Q Now, if you could look at Exhibit 1005,
14 the Klugl reference, which I believe you have a
15 paper copy of. Let me know when you have that in
16 front of you.

17 A I do.

18 Q The German text that you included at the
19 beginning of your post in Exhibit 1025 can be
20 found at column 7, lines 11 through 19, of Klugl,
21 correct?

22 A Yes.

1 Q So, your post relates to this particular
2 passage from Klugl, doesn't it?

3 A It does.

4 Q And then in your post, after quoting that
5 German text from Klugl, you go on to note that
6 this is from a patent on a fuel injector, right?

7 A Correct.

8 Q And the patent you're referring to there
9 is Klugl, correct?

10 A Correct.

11 Q And in that German text, you appear to
12 annotate one particular term by surrounding it
13 with stars, correct?

14 A Correct.

15 Q And that term is "hububersetzung," correct?

16 A Correct.

17 Q Now, in your post, after you say this is
18 from a patent on a fuel injector, you say: I
19 found...

20 And then you list what appear to be three
21 translations for the term "hububersetzung"; is that
22 right?

1 A I see two.

2 Q So, you have the words -- so, the two I
3 think you are referring to are stroke translation
4 and stroke step-up?

5 (Indiscernible crosstalk.)

6 Q And then you also say: And was also
7 offered stroke ratio.

8 Do you see that?

9 A Oh, yes, I see that.

10 Q So, three translations, stroke
11 translation, stroke step-up and stroke ratio,
12 correct?

13 A Correct.

14 Q Now, for the first two, you provide what
15 appear to be patent links; is that right?

16 A That's correct.

17 Q Did you identify those yourself?

18 A Yes, I did.

19 Q So, the first link appears to be a patent
20 that you characterize as, quote, machine
21 translated; is that right?

22 A Correct.

1 Q And the machine translation translated
2 hububersetzung as stroke translation. Is that what
3 you're noting here?

4 A Yes.

5 Q Now, the second link appears to be to a
6 particular patent family; is that right?

7 A That's what it states, yes.

8 Q And in that family, hububersetzung was
9 translated as stroke step-up; is that what you
10 found?

11 A Yes.

12 Q So, after listing those three translations
13 of hububersetzung, you go on to ask: What does
14 hububersetzung mean here?

15 Do you see that?

16 A No, actually, what does ubertragung mean
17 here.

18 Q Okay. And what is that word?

19 A That was actually ubertragung means
20 transfer.

21 Q Now, the purpose of this post that you're
22 making here, was to determine what hububersetzung

1 means in the context of column 7, lines 11 through
2 19, of Klugl; is that correct?

3 MR. HIGER: Again, I'm going to caution
4 you, don't get into any work you did unrelated to
5 the declaration on the basis of privilege. If you
6 can answer the question without doing so, then go
7 ahead.

8 A I will follow counsel's advice.

9 Q All right. So, you can't answer that
10 question without revealing attorney-client
11 privileged information; is that your position?

12 A That is my position.

13 Q But the fact remains that you wrote a post
14 on an internet forum where translators can ask
15 questions about translations, and that post was
16 entitled hububersetzung, correct?

17 A That is correct.

18 Q And it included a passage that's found in
19 column 7, lines 11 through 19, of Klugl; is that
20 correct?

21 A That is correct.

22 Q And the post was then responded to by

1 others; is that correct?

2 A Correct.

3 Q And you can see those proposed responses
4 beginning on page 2 of Exhibit 1025; is that
5 right?

6 A Yes.

7 Q And the first response appears to have
8 come 59 minutes after you made your post. Does
9 that appear to be the case?

10 A That appears to be the case.

11 Q And then there were three other responses
12 that came three, four and seven days later,
13 correct?

14 A That appears to be correct.

15 Q So, four responses to your post about the
16 meeting of hububersetzung in column 7, lines 11
17 through 19, of Klugl, correct?

18 A Yes.

19 Q Now, if we can look back at the first of
20 those that's on the top of page 2 of Exhibit 1025,
21 if you could turn to that for me.

22 A On page 2?

1 Q Yes.

2 A Yes.

3 Q So, that response told you that
4 hububersetzung could be translated to refer
5 amplification, amplified actuation, correct?

6 A That's what it states, yes.

7 Q And it goes on to note that hububersetzung
8 appears to refer to, quote, amplified
9 piezoelectric actuators, and it points to a number
10 of sources in support of that, correct?

11 A That's what it does.

12 Q Did you access any of the sources that are
13 linked in this particular post?

14 A I do not recall.

15 Q So, you also, then, presumably don't
16 recall what they said; is that true?

17 A That would be the case.

18 Q Now, the next response is on the bottom of
19 page 2. Do you see that?

20 A Yes.

21 Q And here the poster responded to you that
22 the term "hububersetzung" could be translated as

1 stroke transformation. Do you see that?

2 A That's what it says, yes.

3 Q And the poster goes on to explain that,
4 quote: The point is that two motions or
5 deflections are different but related.

6 Right?

7 A That's what he says, yes.

8 Q Now, if you turn to page 3, there is
9 another response that you can find on the top of
10 that page.

11 Can you turn to that for me?

12 A Yes.

13 Q Now, here the poster informed you that
14 hububersetzung could be translated as, quote,
15 amplification ratio.

16 Do you see that?

17 A Yes.

18 Q And the poster goes on to explain that: I
19 think it refers to amplification of the stroke.

20 Do you see that?

21 A That's what it says.

22 Q And this poster also links the two

1 references. Do you remember if you reviewed
2 those?

3 A No, I do not.

4 Q Now, presumably, you also don't remember
5 what those references say?

6 A That is correct.

7 Q Now, the final response is on the bottom
8 of page 3. Do you see that?

9 A Yes, I do.

10 Q And this poster notes that hububersetzung
11 could be translated as stroke transmission or
12 transfer. Do you see that?

13 A Yes, I do.

14 Q But this post doesn't have any associated
15 sources; is that true?

16 A That is true.

17 Q Now, to summarize, prior to authoring your
18 declaration, you did some research on your own to
19 determine how hububersetzung should be translated,
20 correct?

21 A Yes.

22 Q And you found other patent references that

1 translated the term as either, quote, stroke
2 translation or, quote, stroke step-up, true?

3 A Yes.

4 Q And then you posted a question to an
5 internet forum regarding acceptable translations
6 of hububersetzung in column 7, lines 11 through 19,
7 of Klugl, and you got a number of proposed
8 translations in response, true?

9 A True.

10 Q And those responses identified a number of
11 possible translations to you, including
12 amplification, amplified actuation, stroke
13 transformation, amplification ratio and stroke
14 transmission or transfer, right?

15 A Yes.

16 Q Now, those proposed translations of the
17 term "hububersetzung" use many of the same words
18 that Exhibit 1006 uses when translating
19 hububersetzung, don't they?

20 MR. HIGER: Objection, form.

21 A I do not quite understand your question.

22 Q So, for instance, the proposed

1 translations that you got in response to your
2 question included the word "ratio," correct?

3 A Some of them did, yes.

4 Q And Exhibit 1006 uses the word "ratio"
5 when translating hububersetzung in at least one
6 instance, correct?

7 A That is correct.

8 Q Now, among the responses your post
9 precipitated are discussions of the term
10 "hububersetzung" meaning amplification, motions or
11 deflections that are different but related and
12 amplification or ratios applied to a stroke,
13 correct?

14 A You're speaking about page 2?

15 Q On both page 2 and page 3.

16 A Okay.

17 Q So, all of those words are associated with
18 hububersetzung in the responses that were provided
19 to your question, correct?

20 A Yes, they were.

21 Q Now, you didn't reference in your
22 declaration the fact that you, yourself, had

1 searched for and identified patent literature
2 using different words in place of hububersetzung,
3 correct?

4 A That's true.

5 Q And you also didn't note in your
6 declaration that you queried other translators
7 about the meaning of the term "hububersetzung,"
8 correct?

9 A That is correct.

10 Q And you didn't note in your declaration
11 that other translators proposed translating
12 hububersetzung in several ways, including using
13 terms that appear in Exhibit 1006, like ratio,
14 correct?

15 A That's correct.

16 MR. HERMAN: I don't have any further
17 questions.

18 MR. HIGER: Okay. Let me ask a few
19 follow-up questions.

20 EXAMINATION

21 BY MR. HIGER:

22 Q While you have got Exhibit 1025 open, I

1 just want to make sure the record is clear,
2 because there may have been some confusion with
3 the question. The proposed translations that are
4 listed in Exhibit 1025 are actually posted in
5 response to your question: What does ubertragung
6 mean here?

7 Is that correct?

8 A That's correct.

9 Q So, these are not proposed translations
10 for the word "hububersetzung"; is that correct?

11 A That would be correct. That was -- that
12 was not the answer to my question.

13 Q What was the purpose of your declaration?
14 What was -- what is your base opinion in your
15 declaration?

16 A My base opinion in my -- in the
17 declaration that I -- I gave is that hububersetzung
18 should have been translated with one single term.

19 Q Okay. And is there anything about your
20 conversation with counsel today that changes your
21 belief in that opinion?

22 A No.

1 Q Okay. Do you believe that Exhibit 1006 is
2 a reliable translation of Exhibit 1005?

3 A I do not.

4 MR. HIGER: I don't have any other
5 questions.

6 MR. HERMAN: I don't have anything
7 further. So, with that, I think we are likely
8 done. But thank you for your time today,
9 Ms. Holthaus.

10 MR. HIGER: All right. Thank you,
11 Patrick.

12 THE WITNESS: Thank you.

13 (Deposition concluded at 10:30 a.m.)
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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

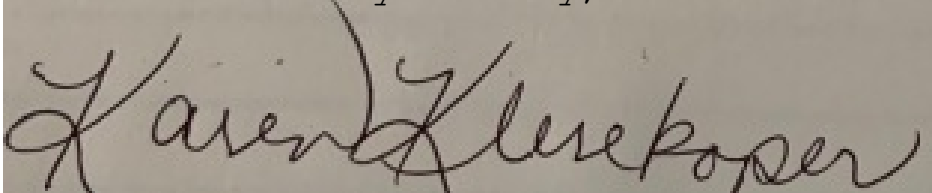
2 I, Karen Klerekoper, Certified
3 Reporter and Notary Public within and for the
4 State of Michigan do hereby certify: That HEIKE
5 HOLTHAUS, the witness whose deposition is
6 hereinbefore set forth, was duly sworn by me
before the commencement of such deposition and
that such deposition was taken before me and is a
true record of the testimony given by such
witness.

7 I further certify that the adverse party,
8 Westport fuel Systems Canada, was represented by
counsel at the deposition.

9 I further certify that the deposition of
HEIKE HOLTHAUS, occurred virtually on Tuesday,
10 July 16, 2024 commencing at 10:04 a.m. EST to
11 10:30 a.m. EST.

12 I further certify that I am not related to
any of the parties to this action by blood or
marriage, I am not employed by or an attorney to
any of the parties to this action, and that I am
in no way interested, financially or otherwise, in
the outcome of this matter.

13 IN WITNESS WHEREOF, I have hereunto set my
14 had this 16th day of July, 2024.

15 
16

17 My commission expires: 10/7/24

18 County of Oakland

19 Notary public in and for the State of Michigan
20
21
22

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