

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL SHADE CORPORATION,)
 Petitioner,)
vs) IPR2023-00580
WITH-U E-COMMERCE (SHANGHAI)) Patent 10,669,738
CO., LTD.,)
 Patent Owner.)
_____))

The deposition of WENDY S. REFFEOR, taken before
Karyn S. Schultz, CSR-4269, Certified Shorthand Reporter
and Notary Public, at 11 Monroe Avenue, Grand Rapids,
Michigan, on the 24th of January, 2024, commencing at
8:59 a.m., pursuant to notice.

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

1

APPEARANCES:

2

3

FOR THE PETITIONER:

4

MR. NATHAN D. REEVES

5

Knobbe, Martens, Olson & Bear

6

925 Fourth Avenue, Ste. 2500

7

Seattle, Washington 98104

8

(206) 405-2000

9

Nathan.reeves@knobbe.com

10

11

12

FOR THE PATENT OWNER:

13

MR. JEFFREY JOHNSON

14

Schmeiser, Olsen & Watts

15

18 E. University Drive, Ste. 101

16

Mesa, Arizona 85201

17

(480) 655-0073

18

Jjohnson@iplawusa.com

19

20

21

22

		Page 3
1	INDEX	PAGE
2	Examination by Mr. Reeves	4
3		
4		
5		
6	EXHIBITS	PAGE
7	Exhibit 1106- Patent 4,607,656	51
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		

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

2 WEDNESDAY, JANUARY 24, 2024

3 GRAND RAPIDS, MICHIGAN

4 8:59 A.M.

5 WENDY S. REFFEOR,

6 the witness herein, having been first duly sworn, was
7 examined and testified as follows:

8

9 EXAMINATION

10 BY MR. REEVES:

11 Q Good morning again, Dr. Reffeor.

12 A Good morning.

13 Q Could you please state your full name for the record?

14 A Wendy Sue Reffeor.

15 Q And your address as well, please.

16 A 5262 LaMont, L-A-M-O-N-T, Farms Drive, Coopersville,
17 Michigan, 49404.

18 Q Have you been deposed before?

19 A No.

20 Q So you understand today that you are testifying under
21 oath, the same as if you were in Court, right?

22 A I do.

1 Q Okay. And is there any reason why you would not be able
2 to give truthful and accurate testimony today?

3 A No.

4 Q And you are represented by counsel today, right?

5 A Yes, I guess. He is counsel for -- I mean --

6 Q Yeah. You are here with counsel?

7 A I am here with counsel, yes. He is not actually
8 representing me, but I'm here with counsel.

9 Q I'm going to hand over paper 17, which is the deposition
10 notice.

11 A Okay.

12 Q Have you seen this document before?

13 A I have.

14 Q And you are aware that you are here to testify in
15 response to the -- to that notice, right?

16 A Yes.

17 Q Just going to cover a -- a few ground rules for today.
18 If you need to take a break at any time, please let me
19 know. And I will just ask that we not take a break when
20 there is a question pending, is that fair?

21 A Absolutely.

22 Q The court reporter is here to record my questions and

1 your answers. So I -- I will try to avoid speaking over
2 you, and I ask that you do the same.

3 A (Nods head) .

4 Q If you don't understand a question, please let me know.

5 If you don't say anything, I will assume that you
6 understood the question, is that fair?

7 A Yes.

8 Q Okay. Your attorney may object to my questions from time
9 to time. And that's just to preserve the record. But
10 you should go ahead and answer my question anyway unless
11 he instructs you not to, fair?

12 A Okay.

13 Q I'm going to refer to the '738 Patent today. When I do,
14 I hope you will understand that that's U.S. Patent Number
15 10,669,738, which is the subject of this proceeding, is
16 that fair enough?

17 A That is.

18 Q All right. You prepared a declaration in connection with
19 this IPR, right?

20 A Yes.

21 Q Do you recall how much time you spent preparing your
22 declaration?

1 A It was somewhere around 20 hours, give or take.

2 Q And, and what did you review while you were preparing it?

3 A I reviewed the Tsai Patent, the Rousselle Patent, and the
4 '738 Patent.

5 Q Okay. Anything else?

6 A I looked around a little bit, you know, at different
7 things, but that -- yeah.

8 Q Okay.

9 A Just out of curiosity.

10 Q Did you look at the file history of the -- of the '738
11 Patent?

12 A I did.

13 Q What about any other -- any other patents or references?

14 A No. No, I realized I started getting into the weeds.

15 And I could have been in the weeds for days. So I
16 decided that, perhaps, that wasn't the best route to
17 follow because I had been instructed what I was supposed
18 to be basing my opinion on.

19 Q You didn't review -- happen to review a reference called
20 Ohnishi?

21 A No.

22 Q Okay. So it would be fair to say that you don't have any

1 opinions in your declaration about Ohnishi?

2 A Absolutely not. It's absolutely true, I do not have any
3 opinions in the --

4 Q And you said you looked around a bit on your own and
5 reviewed a few things. Do you remember at all what you
6 -- what you reviewed?

7 A I know I went out just like on Amazon and looked at some
8 different tent designs just kind of to familiarize myself
9 with what's available. And I did review prior expert
10 testimony a little bit, but mainly just for credentials.
11 I was curious, as this is my first time, who experts
12 generally are.

13 Q Okay. So, so that expert testimony you reviewed, was it
14 in connection with this case or just sort of some other
15 expert declaration that you found?

16 A I did both. I was provided with an example as a -- a
17 template, essentially, for what to expect to put in there
18 that had absolutely nothing to do with the case. And
19 then I did look at the prior expert testimony that was in
20 the file for this case.

21 Q Do you remember whose testimony that was?

22 A I don't.

1 Q Are you aware that the patent owner in this case has
2 submitted a motion to amend the claims of the patent?

3 A I have been advised of that, yes.

4 Q Have you -- have you seen the motion to amend?

5 A I have not.

6 Q Okay. And you haven't given any opinions in your
7 declaration regarding those amendments, right?

8 A Absolutely not.

9 Q What did you do to prepare for the deposition today?

10 A Reviewed all the documents. Spoke with my attorney.

11 Q Okay. How -- approximately how long did you spend
12 reviewing documents?

13 A Total time prepping, roughly around ten hours.

14 Q Okay. And how long were your -- were your calls with
15 Mr. Johnson?

16 A About an hour, twice.

17 Q Okay. Did you talk to anyone other than counsel about
18 the deposition today?

19 A No. Other than that I'm going to be here.

20 Q Sure. Okay. I think you have a copy of this already,
21 but this is Exhibit 2007, which is your declaration.

22 A Okay.

1 Q You recognize this as your declaration, right?

2 A Yes, I do.

3 Q And on page -- I think it's 25 -- is your signature?

4 Just want to make sure that's correct.

5 A Yes, it is. Not that anyone could identify it.

6 Q And you -- you reviewed this declaration before you
7 signed it, right?

8 A Absolutely.

9 Q And to the best of your knowledge, everything in it is
10 correct?

11 A Absolutely. Although I did find a few typos as I was
12 reading it yet again the other night.

13 Q That happens. And I believe at the end of the
14 declaration is your C.V., is that right?

15 A Yes.

16 Q Okay. And when you reviewed this did you find any
17 corrections that needed to be made to your C.V.?

18 A No.

19 Q Okay. Do you know when this C.V. was prepared?

20 A Yes, it was prepared in conjunction with this case.

21 Q Okay. So roughly the same time that the declaration was
22 filed?

1 A Yeah, yeah.

2 Q Do you have any experience prior to this case with
3 collapsible canopies?

4 A Not specifically collapsible canopies, but I have dealt
5 quite a bit with collapsible structures.

6 Q What would be some examples of collapsible structures
7 that you have dealt with before?

8 A Scissor lifts, designed a support for an adult sized
9 swing that's used for disabled people. And that -- I
10 mean, a lot of project work, basically, through the
11 school. Plus I do teach frames and structures, so -- and
12 I have used them, I guess, quite a bit.

13 Q What about any kind of sort of locking mechanism? Do you
14 have any experience with locking mechanisms prior to this
15 case?

16 A Yeah, just through project work. And, again, teaching
17 the material -- not necessarily locking mechanisms, but
18 everything that goes into them.

19 Q Are there any particular examples of locking mechanisms
20 that you have worked with prior to this case?

21 A A couple. We did a -- an air hose retractor that had a
22 locking mechanism so that when it stopped it didn't go

1 any further. Other than that, mostly locking mechanisms
2 in place for automated equipment, things like that.

3 Q Is there anything in your C.V. that you would say is
4 particularly relevant to this case or to the '738 Patent?

5 A Certainly my teaching experience. So I teach statics,
6 machine design, strength of materials -- those are all
7 directly related. And then some of the assistive devices
8 that I have designed -- again, get into frames and
9 collapsible frames and scissors. Let's see, some
10 interesting locking mechanisms on the therapeutic pool
11 support. I would say those are probably the most
12 relevant items, directly relevant.

13 Q Okay. You mentioned you looked at some canopies just on
14 Amazon, right?

15 A Right.

16 Q Okay. Do you remember what -- what brand those canopies
17 were?

18 A No.

19 Q Okay.

20 A No, I wasn't looking that carefully. I was just
21 scrolling through the pictures quickly.

22 Q Have you examined any -- physically examined any

1 collapsible canopies in connection with this case?

2 A No.

3 Q I know you said you haven't been deposed before, but have
4 you served as an expert witness before?

5 A No.

6 Q Okay. I want to talk a bit about just canopies in
7 general. So if you could turn to paragraph 32 of your
8 declaration, I think it's on page 10. And just let me
9 know when you are there.

10 A I am.

11 Q Okay. So here in paragraph 32, you -- you list a few
12 criteria for whether a canopy frame performs its intended
13 purpose, right?

14 A Um-hmm.

15 MR. JOHNSON: Objection, mischaracterizes
16 testimony.

17 Q (BY MR. REEVES) So these criteria that you list in
18 paragraph 32, are these all the criteria for a canopy
19 frame to perform its intended purpose?

20 A I don't know if it's an exhaustive list. It was what I
21 -- it was me writing down my view of how those work.

22 Q So there could be others -- other criteria?

1 A Not that I can think of, but quite possibly. I mean, if
2 we want to work really hard at it, we could probably find
3 something else.

4 Q And in your view, does a canopy frame need to do all of
5 these things to perform its intended purpose?

6 MR. JOHNSON: Objection, vague.

7 A Can you restate the question?

8 Q (BY MR. REEVES) Let's say that a canopy frame did all
9 but one of these things. Would it perform its intended
10 purpose?

11 MR. JOHNSON: Objection, calls for speculation.
12 You can answer the question.

13 THE WITNESS: Okay.

14 A It is possible for a canopy frame to do so; however, I
15 believe that to be a portable canopy frame, all of those
16 are required.

17 Q (BY MR. REEVES) So in paragraph 33, you say, prior
18 collapsible frames have limited the usable volume of the
19 erected structure as the frame itself intruded into the
20 usable space. Do you see that?

21 A Yes.

22 Q Did those prior collapsible frames perform their intended

1 purpose?

2 MR. JOHNSON: Objection, scope. And objection,
3 foundation.

4 A I really can't speak to all prior collapsible frames.

5 There was one in particular mentioned in Tsai, that Tsai
6 claimed intruded into the space, thereby being unsuitable
7 or less than optimal.

8 Q (BY MR. REEVES) Is unsuitable or less than optimal
9 different than not performing its intended purpose?

10 MR. JOHNSON: Objection. Form.

11 A Could you restate the question?

12 Q (BY MR. REEVES) So when you said the -- the prior art
13 canopy described in Tsai that intruded into the usable
14 space was unsuitable or less than optimal?

15 A (Nods head).

16 Q Does that mean it also failed to perform its intended
17 purpose?

18 MR. JOHNSON: Objection, mischaracterizes
19 testimony.

20 A I did not comment directly on that. However, I can show
21 you Tsai's opinion, which is what I did comment on.

22 Q (BY MR. REEVES) Okay. Well, we can get to that in a

1 minute. I have some more questions about Tsai.

2 A Oh, okay.

3 Q What is your opinion in paragraph 32 based on?

4 A That opinion is solely based on my own experience.

5 Q All right. Let's skip ahead to paragraph 35. And could
6 you just read paragraph 35 for me?

7 A The '738 Patent addresses the issues of frame locking in
8 the unfolded position, ease of structure erection, frame
9 stability, and structural strength.

10 Q Does the '738 Patent address any other issues?

11 MR. JOHNSON: Objection. Scope.

12 A I was only asked to review Claim 1. And Claim 1 -- and,
13 of course, the document to understand Claim 1. But Claim
14 1 specifically refers to the supporting legs, the
15 structural -- the side structural supports, the roof
16 structural supports, and the central locking mechanism.

17 Q So these, in your view, are the issues that Claim 1
18 addresses?

19 A Yes.

20 MR. JOHNSON: Objection, foundation.

21 Q (BY MR. REEVES) And so you said you were -- you were
22 only asked to review Claim 1, right?

1 A Yes.

2 Q Is it fair to say that you haven't provided any opinions
3 about any other claims?

4 A Yes.

5 Q I'm going to give you a copy -- you may already have
6 one -- of Exhibit 1001, which is the '738 Patent.

7 A Okay.

8 Q Can you point me to any examples where in the '738 Patent
9 it addresses frame stability?

10 A Yes. In column 4, lines 37 through 43, specifically.
11 And the entire patent is about creating a frame that will
12 support the canopy, but that specifically refers to
13 stability. And actually it goes on all the way through
14 -- actually it goes through line 48. And then in column
15 5, lines 5 through 8; column 7, line 7 through 10. I
16 believe, given we are sitting here watching me read, that
17 those are the only occasions in which that occurs -- or
18 certainly those are occasions where it does occur. I
19 cannot guarantee they are the only ones.

20 Q Let's flip back to your declaration --

21 A Okay.

22 Q -- and take a look at paragraph 37. And once you are

1 there, can you read the last sentence of that paragraph
2 for me?

3 A In this collapsible canopy frame, the X-shaped rod
4 members, once locked in position by the central lock,
5 provide lateral support to the supporting legs.

6 Q Can you describe for me how the X-shaped rod members
7 provide lateral support to the supporting legs?

8 MR. JOHNSON: Objection, mischaracterizes
9 testimony.

10 A Yes. Once that lock is locked, if you look at the
11 scissoring mechanism in the canopy support, which is that
12 in Claim 1C, the plurality of inner retractable units.
13 Once the lock is in place, those cannot move. Once they
14 cannot move, the legs cannot move. And the side to side
15 motion cannot occur as well.

16 Q (BY MR. REEVES) So if -- once the lock is in place, the
17 inner retractable units can't move. And once the inner
18 retractable units can't move, the legs can't move. Why
19 does the canopy need the outer scissoring units?

20 MR. JOHNSON: Objection, mischaracterizes
21 testimony, and form.

22 A Essentially those outer retractable units prevent

1 rotation of the legs, inward or outward. Because you
2 have two points fixed, top and bottom, that prevents
3 rotation of the legs. Without that, if you just had a --
4 a single point at the top, it wouldn't prevent that
5 rotation. You need that extra lateral stability.

6 Q (BY MR. REEVES) And, and so that means that those inner
7 retractable units can also move in at least one axis,
8 right?

9 MR. JOHNSON: Objection, foundation.

10 A I think you need to clarify that one.

11 Q (BY MR. REEVES) So you said -- do you remember saying
12 that the outer retractable units act to prevent rotation
13 of the legs?

14 A Yes.

15 MR. JOHNSON: Objection, mischaracterizes
16 testimony.

17 Q (BY MR. REEVES) And the legs are attached to the inner
18 retractable units, right?

19 A Yes.

20 Q So if the legs can rotate, then the inner retractable
21 units must also be able to rotate since the two are
22 connected, right?

1 MR. JOHNSON: Objection, calls for speculation.

2 A I believe that is true. Because if I look at that
3 structure, it's a two dimensional structure. And so
4 while you are not going to get a lot of rotation, you
5 could have this fixed and -- I'm a very visual person.

6 Q (BY MR. REEVES) Unfortunately, we have got to get
7 everything in the record, so please do your best to
8 describe --

9 A I will. I will. So if I'm fixed here (indicating),
10 okay? So I have got the scissor, right? And I am fixed
11 at one end. And I'm attached here. And I can do some of
12 -- there is some rotation allowed at the leg because of
13 the structure. You have a large span of semi rigid two
14 dimensional structures that cannot truly provide support
15 in the third dimension, and so it allows rotation.

16 Q So it's fair to say that even when the central lock is
17 locked, the inner units are able to rotate some amount?

18 A Yes.

19 MR. JOHNSON: Objection, calls for speculation.
20 And objection, foundation.

21 A I guess a better answer to that would be without building
22 it, and actually going out and grabbing it, I cannot be

1 100 percent certain. But based on my experience, yes,
2 without the entire structure you would have a problem.

3 Q (BY MR. REEVES) And so in your view, the X-shaped rod
4 members help to resist some of that rotation from the
5 inner units in the legs, right?

6 MR. JOHNSON: Objection, foundation.

7 A That's not what I said, but -- could you re-ask the
8 question?

9 Q (BY MR. REEVES) Sure. Is it your view that the X-shaped
10 rod members help to resist rotation from the inner units
11 and the legs?

12 MR. JOHNSON: Objection. Foundation. You can
13 answer the question.

14 THE WITNESS: Yeah, I'm just thinking.

15 A It is my opinion that without those X-shaped rods the
16 structure itself would not be in a rigid position. It
17 would allow some rotation of the legs about the axis of
18 the inner structural supports.

19 Q (BY MR. REEVES) Okay. I'm going to move on to paragraph
20 38. And in paragraph 38 you are talking about the
21 plurality of inner retractable units, right?

22 A Yes.

1 Q And you have circled them in blue on the next page,
2 right?

3 A I did.

4 Q And in these figures on page 13, the left hand figure is
5 Figure 16, I believe, and the right hand figure is Figure
6 21. Do you know if that's right?

7 A I can double check and make sure, but I believe you are
8 correct. Let me see -- yes, that is correct.

9 Q So on the left hand figure, Figure 16, those inner units
10 are Y-shaped at each end, is that fair?

11 A That is correct.

12 Q And in the right side in Figure 21, the inner units are
13 X-shaped rather than Y-shaped, right?

14 A Yes.

15 Q Could you read paragraph 39 for me?

16 A Yes. Oh, out loud?

17 Q If you don't mind.

18 A Sorry. Yeah, I read it. Claim 1D describes the central
19 lock used to ensure the frame remains rigid and supports
20 the canopy when in the unfolded state, shown below in
21 Figure 2 of the '738 Patent.

22 Q Can you describe for me how the central lock is used to

1 ensure the frame remains rigid?

2 A Absolutely. Once the central lock is locked, there can
3 be no motion within the -- either Y-shaped or X-shaped
4 supporting members. That restriction of motion in turn
5 restricts the motion of the X-shaped members supporting
6 the legs. And once those two motions are restricted, you
7 restrict all 6 degrees of freedom.

8 Q So when you say motion, you are referring to both
9 translational and rotational motion or one or the other?

10 MR. JOHNSON: Objection, mischaracterizes
11 testimony.

12 A I am referring to -- yes, all 6 degrees of freedom, three
13 translational, three rotational.

14 Q (BY MR. REEVES) Okay.

15 A Excuse me, you do have one degree of freedom, you can
16 lift the whole thing up.

17 Q Fair enough.

18 MR. REEVES: If we wanted to take a break, now
19 would be a good time for me.

20 THE WITNESS: Okay.

21 (A recess was taken at 9:49 a.m.).

22 (Proceedings reconvened at 9:56 a.m.).

1 Q Welcome back. During the break did you discuss your
2 testimony at all with counsel?

3 A No, didn't even see him.

4 Q Just before I forget, I want to give you a copy of
5 Exhibit 1003, which is Rousselle, and might as well hand
6 out Exhibit 1005, which is Tsai.

7 But I'm going to continue with your
8 declaration. So let's take a look at paragraph 40. And
9 if you could read it out loud for me?

10 A Prior collapsible frames have limited the usable volume
11 of erected structure as the frame itself intruded into
12 the usable space.

13 Q Sorry, paragraph 40?

14 A I'm sorry, I flipped the wrong way.

15 Q That's all right.

16 A Paragraph 40 says, Rousselle describes a collapsible
17 umbrella style shelter/tent with frame locking mechanism
18 and assembly pole.

19 Q Does Rousselle describe more than one embodiment of a
20 shelter or tent?

21 A Yes.

22 Q And just looking at the figures in Rousselle, could you

1 give me a couple examples of different embodiments that
2 Rousselle describes of the shelter or tent?

3 A Can you clarify that question?

4 Q I guess what I'm looking for is, is just something like,
5 you know, this figure shows one embodiment, this figure
6 shows another embodiment.

7 A Oh, okay.

8 Q I'm just interested in which figure pertains to a
9 different embodiment in Rousselle.

10 A Okay.

11 MR. JOHNSON: Objection, foundation.

12 A Okay, Figure 1(A).

13 MR. JOHNSON: Objection, form as well.

14 A Let's call it Figure 1 -- 1(A), Figure 1(B), Figure 1(C),
15 Figure 18(A), all show different embodiments. If you
16 will excuse me just a moment? I apologize.

17 Q Looking back at paragraph 40, you mentioned an assembly
18 pole. Do you see that?

19 A Yes.

20 Q The, the assembly pole -- Rousselle describes that,
21 right?

22 A Yes.

1 Q And it describes it as optional, is that right?

2 A Yes.

3 Q And Rousselle discloses that that assembly pole is one
4 way that a single person could unfold the canopy by
5 themselves, right?

6 MR. JOHNSON: Objection, mischaracterizes
7 evidence.

8 A Actually, there is nothing in my declaration that
9 addresses that pole, other than that statement. And the
10 reason I didn't is it is optional and does not affect the
11 current analysis.

12 Q (BY MR. REEVES) So you are not sure whether the assembly
13 pole would allow a single person to unfold the canopy by
14 themselves or not, is that fair?

15 MR. JOHNSON: Objection, mischaracterizes
16 testimony.

17 A Having never done it myself, I don't know honestly.

18 MR. JOHNSON: I'm going to object, relevance as
19 well.

20 Q (BY MR. REEVES) So you listed, I think, four different
21 embodiments of the -- the shelter or tent that Rousselle
22 discloses. Do you remember that?

1 MR. JOHNSON: Objection, mischaracterizes the
2 testimony.

3 A Without going back and counting, I'm not sure, but that
4 sounds like roughly the right number.

5 Q (BY MR. REEVES) Did you consider each of those different
6 embodiments in your analysis?

7 MR. JOHNSON: Objection, foundation.

8 A As they pertain to Claim 1 of '738, I did.

9 Q (BY MR. REEVES) In paragraph 41 of your declaration, you
10 are discussing the locking mechanism in Rousselle, right?

11 A Yes.

12 Q And you have included Figure 4(B) from Rousselle here,
13 correct?

14 A Yes.

15 Q And that shows Rousselle's locking mechanism, right?

16 A It does -- one embodiment. I believe he has others.

17 Q Okay. Is Figure 2(A) of Rousselle another embodiment?

18 A It is a detail of another possible connecting mechanism.

19 Q And did you consider Figure 2(A) and that embodiment in
20 your analysis?

21 A Yes.

22 Q Okay. I want to skip ahead a bit to paragraph 45. And

1 could you read that out loud for me, please?

2 A If the frame is installed inside the umbrella tent, the
3 frame will impart an outward force against the cover
4 creating a more rigid unibody type of structure.

5 Q What would happen if you installed the frame outside of
6 the cover?

7 MR. JOHNSON: Objection, scope. Objection,
8 calls for speculation.

9 Q (BY MR. REEVES) Let me actually back up for a second.

10 A Sure.

11 Q Do you know whether Rousselle discloses installing the
12 frame outside of the cover?

13 MR. JOHNSON: Objection, foundation.

14 A He does not allow for -- wait a sec -- wait, wait, wait,
15 wait, wait. He does not allow for only the frame to be
16 outside. He does allow for inside and outside. He
17 specifically says that, the covering, so long as it
18 imparts the necessary -- exactly where -- in line, column
19 6, line 49 and 50, the floor can be admitted (sic) or can
20 be optional in certain embodiments. In addition, as long
21 as the cover imparts the necessary forces (discussed
22 below), portions of the sides and the ceiling can be

1 omitted as desired.

2 Q Can you take a look at column 3, lines 35 and 37 of
3 Rousselle?

4 MR. JOHNSON: Could you repeat that?

5 MR. REEVES: Column 3, lines 35 through 37.

6 MR. JOHNSON: Thank you.

7 Q (BY MR. REEVES) Let me know when you had a chance to --

8 A I have.

9 Q Does that change your opinion at all that you gave in
10 your previous answer?

11 A He does say he can do that. However, he then essentially
12 contradicts himself by saying that you must be able to
13 impart the necessary forces using the cover. I mean, I
14 -- I have seen tents where they are outside, and they use
15 clips to do that, so he could. So it could resolve the
16 -- the contradiction in that way. So you could have an
17 inside or an outside. However, also, in my opinion,
18 there is nothing that depends upon that being inside or
19 outside.

20 Q So when you say the necessary forces, what, in your view,
21 are those forces necessary to do?

22 MR. JOHNSON: Objection, foundation.

1 A In Rousselle, he states that those forces are necessary
2 to create the springing action in the legs.

3 Q (BY MR. REEVES) Could you use Rousselle's central lock
4 in a canopy that doesn't have those forces?

5 MR. JOHNSON: Objection. Form. Foundation.
6 And calls for speculation.

7 A Could you rephrase that one?

8 Q (BY MR. REEVES) Is there something in particular about
9 the question that you don't understand?

10 A Are you asking about the inner action of the frame with
11 the canopy or are you asking about the structural members
12 employed?

13 Q Let me ask it this way. Could you use Rousselle's
14 central lock in a canopy that doesn't have the same
15 structural design as any of the embodiments disclosed in
16 Rousselle?

17 MR. JOHNSON: Objection. Form. Foundation.
18 Calls for speculation. You can answer the question.
19 Just preserving it for the record, that's all.

20 THE WITNESS: Yeah, I was just thinking.

21 A Yes.

22 Q (BY MR. REEVES) Let's take a look at paragraph 46.

1 A Okay.

2 Q In paragraph 46 you are describing part of the way that
3 Rousselle's canopy folds, is that fair?

4 A That is very fair.

5 Q And, and you mentioned that part of this is an inverting
6 motion of the leg tubes 310, right?

7 A Yes.

8 MR. JOHNSON: I'm going to object. It
9 mischaracterizes testimony.

10 Q (BY MR. REEVES) Is the inverting motion that you
11 describe here required by Rousselle?

12 MR. JOHNSON: Objection. Foundation. Form.
13 And calls for speculation.

14 A I can say that he clearly defines that in the description
15 of the frame.

16 Q (BY MR. REEVES) So he discloses it, right?

17 A Yes, he teaches it.

18 Q Does he teach that you have to do it?

19 MR. JOHNSON: Objection. Form. Foundation.

20 A He says you can, not you must. However, every single
21 embodiment he shows, and every description he gives
22 involves that motion. And he does not give any

1 alternatives to that motion.

2 Q (BY MR. REEVES) There is nothing in Claim 1 of the '738
3 Patent that requires that motion, right?

4 A Absolutely not.

5 Q There is nothing in Claim 1 of the '738 Patent that
6 describes how a user has to unfold a canopy at all,
7 right?

8 MR. JOHNSON: Objection, mischaracterizes
9 evidence. And I'm going to raise the same objection to
10 the previous question.

11 A Could you rephrase your -- or not rephrase, but repeat
12 your question just so that I am certain I'm answering
13 exactly what you asked?

14 Q (BY MR. REEVES) Sure. There is nothing in Claim 1 of
15 the '738 Patent that describes how a user has to unfold
16 the canopy at all, right?

17 MR. JOHNSON: Same objection.

18 A In column 4 he discusses how that canopy is unfolded.
19 And his Figures 1, 19 and 20 -- 20 shows clearly the
20 collapsed state. And 19 and 1 show the -- wait a second,
21 19 and 21 are the same embodiment. Let's see -- show one
22 embodiment of the -- the invention in a semi collapsed

1 state --

2 Q Okay.

3 A -- so by illustrating how it does unfold.

4 Q So I understand that the patent describes how the canopy
5 is unfolded. I'm asking specifically about Claim 1.

6 Does, does Claim 1 describe how a user has to unfold a
7 canopy?

8 MR. JOHNSON: Objection, calls for speculation.

9 A Claim 1 does not specifically state how to unfold the
10 canopy. However, if you read through the body of the
11 patent, it does describe that very clearly.

12 Q (BY MR. REEVES) Looking back at Rousselle for a minute.
13 Whether or not the legs of Rousselle's canopy invert when
14 you fold it doesn't affect the operation of the central
15 lock, right?

16 A That is --

17 MR. JOHNSON: Objection, calls for speculation.

18 And objection, foundation. You can answer.

19 THE WITNESS: Okay.

20 A To the best of my knowledge, no, it does not.

21 Q (BY MR. REEVES) Could you take a look at column 16, line
22 -- starting at line 16 in Rousselle?

1 MR. JOHNSON: Could you repeat that?

2 MR. REEVES: Column 16, line 16.

3 MR. JOHNSON: Thank you.

4 Q (BY MR. REEVES) And could you read out loud the sentence
5 that begins toward the end of that line?

6 A Sure. It again noted that the various leg segment
7 shapes, et cetera, can be varied extensively between
8 embodiments, and that the illustrated and described
9 embodiments are merely exemplary designs.

10 Q Does this sentence suggest to you that you could use some
11 other design for a leg other than the embodiments that
12 Rousselle discloses in Rousselle's canopy?

13 MR. JOHNSON: Objection. Mischaracterizes
14 evidence. Calls for speculation.

15 A Not, not when taken in context, no, because he is just
16 discussing the cross section of the band bars.

17 Q (BY MR. REEVES) Let's flip back to your declaration and
18 look at paragraph 47.

19 A Okay.

20 Q And in this paragraph you are discussing the hinges in
21 Rousselle's canopy frame, is that right?

22 A Yes.

1 Q And one of the things you site is -- I think this is
2 probably Rousselle at column 11, lines 4 through 33, is
3 that right?

4 A Um-hmm.

5 Q Okay. Let's take a look at that. Could you read the
6 first two sentences of that passage?

7 A In this manner, an angle can be formed between the band
8 bar and the leg -- band bar 320 and the leg tube 310
9 through the hinge 312. This angle (formed between the
10 axes of the two connecting members 330 and 340) can be in
11 a broad range between about 180 degrees, (180 degrees can
12 be provided for instance using elements like that shown
13 in Figures 8(D) and 11(D)) and 90 degrees (90 degrees can
14 be provided for instances using elements like that shown
15 in Figure 8(A) and 11(B), but with the flat sides 343B
16 angled to create a 90 degree angle, such as both being 45
17 degrees).

18 Q So in that passage, Rousselle discloses that the hinges
19 can be made for angles between 90 and 180 degrees, right?

20 MR. JOHNSON: Objection, mischaracterizes
21 evidence.

22 A No, because if we go down to line 14, it says, the

1 present invention allows angles far closer to 90 degrees
2 than previously possible, and notably angles of less than
3 155 degrees, and even less than 140 degrees, and even
4 less than 125 degrees, and even less than 110 degrees.
5 As noted, these angles can be selected as desired. So he
6 says in the subsequent information that he gets close to
7 90, and even makes a big deal out of while how close he
8 can get to 90, without specifically saying you can get
9 there.

10 Q Doesn't line 10 specifically say 90 degrees can be
11 provided?

12 A It does, but he very clearly goes on -- I mean, yes,
13 that's what that sentence says. But he very clearly goes
14 on to state that, not really.

15 Q Can you read the -- I guess it's a paragraph, and also a
16 sentence that begins at column 11, line 28?

17 A Thus, the present invention enables a shelter/tent to
18 have a corner between a ceiling and a side that is at or
19 near a right angle, which allows for substantial increase
20 in usable space inside the structure than with
21 conventional dome shape designs.

22 Q So doesn't that also pretty clearly say it could be at a

1 right angle?

2 A It says --

3 MR. JOHNSON: Objection --

4 THE WITNESS: Oh, go ahead.

5 MR. JOHNSON: Objection, foundation.

6 THE WITNESS: Okay.

7 A He does say that. However, he does not in any way, shape
8 or form explain how that could be possible. Nor do any
9 of his embodiments imply that it is or show that it is.

10 Q (BY MR. REEVES) Okay. I want to look at paragraph 48,
11 and specifically the sentence that begins on the last
12 line of page 16.

13 A Okay.

14 Q Could you read that sentence for me?

15 A The fact that the hinges described cannot reach 90
16 degrees is due to the forces applied by the flexed band
17 bars 320. Additionally, Rousselle clearly describes the
18 potential energy caused by flexing the frame assisting in
19 erecting the structure, for example, discussing the
20 flexure of band bars 320 in column 11, lines 34 through
21 40 and how the legs are caused to flex and to thus store
22 potential energy in column 13, lines 5 through 21.

1 Q So you site Rousselle at column 11, lines 34 through 40
2 there, right?

3 A Yes.

4 Q Let's take a look at that. And so the sentence -- do you
5 see the sentence where Rousselle discusses the flexure of
6 the band bars 320?

7 A Yes.

8 Q That sentence is discussing the embodiment shown in
9 Figure 1(C), right?

10 A Yes, it is.

11 Q And in that passage starting at line 34 Rousselle
12 contrasts Figure 1(C) with Figures 1(A) and 1(B), is that
13 fair?

14 MR. JOHNSON: Objection, mischaracterizes
15 evidence. Actually, I'm going to withdraw that
16 objection.

17 A And I don't believe it is putting them in contradiction
18 to each other. He is just describing the embodiments.
19 He is not saying that they are dramatically different
20 from each other. He is just saying -- my interpretation
21 is, this is what 1(A) and 1(B) are, and this is what 1(C)
22 is.

1 Q (BY MR. REEVES) And that section talking about the
2 flexure of the band bars 320 is in the section where he
3 is describing Figure 1(C), right?

4 MR. JOHNSON: Objection, foundation.

5 A At that point he is specifically talking about 1(C).
6 However, there are other points where he is discussing in
7 general flexure and the use of the canopy to provide
8 flexure.

9 Q (BY MR. REEVES) And so going back to paragraph 48 of
10 your declaration. You -- right at the end you cite
11 column 13, lines 5 through 21 of Rousselle. Do you see
12 that?

13 A Yes.

14 Q Let's take a look at that. Let me know when you have had
15 a chance to read that to yourself. Actually, you know
16 what, I don't actually have a question about that
17 section, so don't worry about it.

18 A Okay. I will continue reading it.

19 Q If a person of ordinary skill in the art wanted to make
20 Rousselle's legs less flexible, they could do that,
21 right?

22 MR. JOHNSON: Objection. Foundation. Form.

1 A I believe that Rousselle teaches away from that. He
2 could -- or a person of ordinary skill could make them
3 less flexible, but he still requires that flexibility.
4 He still discusses the canopy providing forces against
5 the legs in order to -- the legs and the entire structure
6 in order to complete the motions that he describes for
7 the walking mechanism. He also describes it as being
8 part of the support structure.

9 Q (BY MR. REEVES) So I -- I want to distinguish for a
10 minute between what's possible and what's a good or bad
11 idea.

12 A Okay. That's fine.

13 Q So, so if you -- if you wanted to make the portions of
14 Rousselle's canopy frame less flexible -- not
15 withstanding whether it's a good or bad idea -- you could
16 do it, right?

17 MR. JOHNSON: Objection. Calls for
18 speculation. Scope.

19 A Rousselle teaches away from it.

20 Q (BY MR. REEVES) Does that mean Rousselle teaches you
21 can't do it or that it's a bad idea?

22 MR. JOHNSON: Objection, form.

1 A Rousselle teaches that the flexibility of the structure
2 is required. It is a part -- an integral part of his
3 description.

4 Q (BY MR. REEVES) Let's say you took one of Rousselle's
5 canopy legs and removed it from the canopy, and now it's
6 just a structural member that you have.

7 A Okay.

8 Q Would you be able to make that structural member less
9 flexible?

10 MR. JOHNSON: Objection, foundation.

11 Objection, calls for speculation.

12 A I can answer that question, but I don't see how it's
13 relevant as that is something that he teaches away from.

14 Q (BY MR. REEVES) I would --

15 A Of course I can make anything more rigid or less rigid.
16 That's what engineers do all the time. But Rousselle
17 definitely teaches away from it for his invention -- or
18 is it her? I guess I probably shouldn't be sexist. I'm
19 sorry, her invention.

20 MR. REEVES: We are once again at a point where
21 it would be a good time to take a break if we want one.

22 (A recess was taken at 10:41 a.m.).

1 (Proceedings reconvened at 10:48 a.m.).

2 Q I want to move ahead to paragraph 51 of your declaration.

3 Before I do that, let me ask, did you discuss your

4 testimony with counsel during the break?

5 A No. He does a really good job of disappearing.

6 Q Okay. Paragraph 51. So in this paragraph you are

7 discussing part of the structure of Tsai's canopy frame,

8 is that fair?

9 A Yes.

10 Q Can you describe which part of Tsai's canopy frame you

11 are discussing in paragraph 51?

12 A Yes. It is -- I want to be certain that I'm in the right

13 section -- yes, he describes a secondary or second

14 scissoring device along the sides of his structure --

15 complex scissor, I would call it.

16 Q And that's what's shown in Figure 20, is that right?

17 A It is.

18 Q And a different embodiment is shown in Figure 1, is that

19 right?

20 A Yes -- wait a second -- let me make sure of that.

21 MR. JOHNSON: Objection, mischaracterizes

22 evidence.

1 A It is a different one in Figure 1.

2 Q (BY MR. REEVES) And so is it your understanding that
3 Tsai is disclosing that you could use either the Figure 1
4 embodiment or the Figure 20 embodiment?

5 A Yes.

6 Q I don't know whether Tsai discloses other embodiments,
7 but there are probably other embodiments that would work
8 in this canopy, right?

9 MR. JOHNSON: Objection, calls for speculation.

10 A I did not address that one way or the other. I believe
11 he only shows the two.

12 Q (BY MR. REEVES) Do you have an opinion sitting here
13 today on whether there are other ones that could work,
14 other embodiments that could work?

15 MR. JOHNSON: Objection, foundation. I'm going
16 to object on scope as well. Objection, scope.
17 Objection, calls for speculation.

18 A Without careful examination that I don't have the time to
19 do here, I prefer not to answer that as it does not
20 impact the declaration.

21 Q (BY MR. REEVES) What would you need to do to form an
22 opinion on that question?

1 A Oh, I have an opinion on the question; however, it
2 doesn't impact what's in the declaration. Is there
3 anywhere in the declaration -- I guess I'm not supposed
4 to be the one asking questions, but is there anywhere in
5 the declaration where you see that impacting what I have
6 written?

7 Q I'm just trying to understand your view of what Tsai
8 discloses about -- about these scissoring devices, and --
9 and whether -- whether Tsai is limiting his disclosure to
10 -- to particular embodiments or whether other embodiments
11 are possible. So what I want to understand is whether
12 other embodiments, other than the two that are discussed
13 here in your declaration, could be used in -- in Tsai's
14 canopy in place of any other scissoring devices?

15 A Okay. Yeah, abso --

16 MR. JOHNSON: Objection, form. Go ahead.

17 A Absolutely. These scissoring devices are used -- Tsai
18 didn't invent the scissoring device. These are used in
19 all sorts of structures. And so he does not necessarily
20 teach away from using other ones, but also that's not
21 part of -- the only thing that is part of -- specifically
22 called out in Tsai as part of his invention is that

1 secondary scissoring device being used in a canopy.

2 Everything else is fair game. Because if you look at

3 scissor lifts and any number of other -- you know, the

4 grabber claws that go out and grab cans for you and come

5 back, these scissoring devices are used all over the

6 place. So there is nothing special about a scissoring

7 device in Tsai, other than that application of the

8 secondary one there.

9 Q So I noticed in a few of these paragraphs here, 51, 52,
10 53, and I think 54, you refer to amended claims.

11 A Yes.

12 Q Those are in Tsai, is that right?

13 A Yes.

14 Q And are -- are those amended claims consistent with the
15 rest of Tsai's disclosure to your understanding?

16 MR. JOHNSON: Objection, form. And objection,
17 foundation.

18 Q (BY MR. REEVES) I guess what I'm trying to understand
19 is, in your view, and when you conducted your analysis,
20 did those claims limit what you thought Tsai was
21 disclosing?

22 A Oh, no, no. I used them as part of the entire review.

1 Q So these are just sort of examples of where in Tsai these
2 things are disclosed, is that fair?

3 MR. JOHNSON: Objection, foundation.

4 A Are you asking when I say, amended Claim 1 and amended
5 Claim 2, am I referring specifically to those claims with
6 that paragraph?

7 Q (BY MR. REEVES) I, I think what I'm asking is when --
8 when you refer to amended Claim 1 and amended Claim 2,
9 are you just giving an example of where in Tsai this is
10 discussed or are you saying this is the only place in
11 Tsai where this is discussed?

12 MR. JOHNSON: Objection, form.

13 A That is where I found that information.

14 Q (BY MR. REEVES) And you considered all of Tsai's
15 disclosure in your analysis, right?

16 A Yes.

17 Q I want to talk about paragraph 53 for a minute. And in
18 paragraph 53 you give an opinion that Tsai's canopy
19 supporting rods 3 are flexible elements, is that right?

20 MR. JOHNSON: Objection, mischaracterizes
21 testimony.

22 A I give supporting evidence for the interpretation that

1 those are flexible elements.

2 Q (BY MR. REEVES) And the supporting evidence you give is
3 from Tsai's figures, right?

4 A Primarily, yes.

5 Q What, what other supporting evidence do you give?

6 A I do not give other supporting evidence. And the reason
7 for that is, in my opinion, a person of ordinary skill in
8 the art is going to see that, and that will be their
9 interpretation as well.

10 Q Tsai doesn't say anywhere in the specification, as
11 opposed to the figures, that the rods are flexible,
12 right?

13 MR. JOHNSON: I'm going to object to form.

14 A I would say that what I found at the time that I wrote
15 the declaration was that information. It is possible
16 that somewhere else he also refers to it, I don't know.

17 Q (BY MR. REEVES) Let's take a look at the '738 Patent for
18 a minute.

19 A Okay.

20 Q And let's look at Figure 16.

21 A Okay.

22 Q Do you see the -- the piece -- structural member marked

1 8?

2 A Yes.

3 Q What is that piece?

4 A I'm trying to remember what he called it. It is an inner
5 retractable unit.

6 Q Do you know whether that inner retractable unit 8 is
7 flexible or not flexible?

8 A To my recollection, there is nothing in the document that
9 specifies either way. But, I mean, theoretically
10 everything is flexible, just depends on how much force
11 you put on it. It does not appear to be intended to be
12 flexible.

13 Q What is your basis for saying that it does not appear to
14 be intended to be flexible?

15 A There is nothing in the document itself that refers to or
16 implies flexibility in that element. And every
17 embodiment shows it as being straight, not arched.

18 Q All right. I want to go back to your declaration and
19 look at paragraph 55.

20 A Okay.

21 Q And here in paragraph 55 you talk about Tsai's
22 disparagement of prior art solutions. Do you see that?

1 A Yes.

2 Q What are the prior art solutions you are referring to
3 here?

4 A He specifically refers to Figure 16 and 17 of his patent.

5 Q Yeah, let's take a look at those figures. Could you just
6 describe the -- could you just describe what's shown in
7 Figure 17?

8 A Figure 17 shows a canopy support structure composed of
9 internal scissoring mechanisms connected to a central
10 locking support.

11 Q And how do you know the central piece is a locking
12 support?

13 MR. JOHNSON: Objection, foundation.

14 A Could you repeat the question now that I have thought
15 about it for a very long time?

16 Q (BY MR. REEVES) Yeah. How do you know that the central
17 piece is a locking support?

18 MR. JOHNSON: Objection, foundation. And
19 objection, misstates evidence.

20 A The only way for that tent to stay supported is if that
21 is a locking mechanism. The linkage has to lock in order
22 for that to work. Otherwise the weight of the canopy

1 would force it down.

2 Q (BY MR. REEVES) Couldn't you use leg locks?

3 MR. JOHNSON: Objection, calls for speculation.

4 A There is nothing that implies there are leg locks in
5 there. And as a matter of fact, Tsai's entire patent is
6 based on adding the leg locks.

7 Q (BY MR. REEVES) Tsai didn't invent leg locks, though,
8 right?

9 A No.

10 MR. REEVES: Can we take a short break?

11 (A recess was taken at 11:19 p.m.).

12 (Proceedings reconvened at 11:25 p.m.).

13 Q So can we take a look at Tsai? And I'm looking
14 specifically at page 2, lines 26 through the end of the
15 page. Just let me know when you are there.

16 A I'm there.

17 MR. JOHNSON: You said page 2?

18 MR. REEVES: Page 2.

19 MR. JOHNSON: Okay. Thank you.

20 Q (BY MR. REEVES) So this paragraph is discussing U.S.
21 Patent Number 4,607,656, right?

22 A Yes.

1 Q And it says, the frame disclosed in the 656 patent is a
2 marginal improvement over the frame illustrated in
3 Figures 16 and 17. Do you see that?

4 A Yes.

5 Q So I'm going to mark Exhibit 1106, which is U.S. Patent
6 Number 4,607,656.

7 A Okay.

8 (Deposition Exhibit No. 1106 marked).

9 Q And this is the patent that Tsai is discussing in this
10 paragraph, right?

11 A Yes.

12 Q And if you take a look at column 2, starting at line
13 58 -- let me know when you are there.

14 A Okay.

15 Q Could you read the first sentence of that paragraph?

16 MR. JOHNSON: Objection, scope.

17 A Okay. I lost my spot. Can you tell me again where I
18 was?

19 Q Column 2, line 58.

20 A Okay. As shown in Figure 6, the slider 58 can be
21 maintained in its shelter erecting condition by means of
22 an abutment button 70 which is biased by means of a leaf

1 spring 72 through a hole 74 in a leg upper end 48 and
2 through a mating hole 76 on the slider 58.

3 Q That's describing a leg lock, right?

4 MR. JOHNSON: Objection, scope. Objection,
5 calls for speculation.

6 A As I did not review this patent prior, it may, but I'm
7 not aware of the applicability to what we are talking
8 about.

9 Q (BY MR. REEVES) Well, Tsai -- Tsai seems to think that
10 this patent is similar to the frame illustrated in Figure
11 16 and 17, right?

12 MR. JOHNSON: Objection, mischaracterizes
13 evidence. And objection, scope.

14 A He says it is a marginal improvement over. That includes
15 many of the same shortcomings.

16 Q (BY MR. REEVES) But you are not sure whether this 656
17 patent is disclosing the use of leg locks?

18 MR. JOHNSON: Objection, scope. Objection,
19 calls for speculation.

20 A I didn't say it wasn't disclosing it. I was saying I
21 didn't think it was relevant. I don't understand the
22 relevance.

1 Q (BY MR. REEVES) Well, I'm trying to understand whether
2 Figure 16 and 17 could use leg locks. And so if this
3 patent uses leg locks, wouldn't that suggest to you that
4 Figure 16 and 17 in Tsai could use leg locks?

5 MR. JOHNSON: Objection, scope. Objection,
6 calls for speculation.

7 A That was not my interpretation of the Figure 16 and 17.

8 Q (BY MR. REEVES) Remind me what your interpretation of
9 Figure 16 and 17 was.

10 A That it is a canopy support that uses the linkage
11 designed to lock the center pole in place, thereby
12 creating a central locking mechanism.

13 Q Does Tsai say anywhere that that central pole includes a
14 locking mechanism?

15 A He does not specifically say that. However, I believe
16 that a person of ordinary skill in the art would
17 interpret it that way.

18 Q Why do you believe that?

19 A Because of the orientation of the linkages. They are in
20 a locked position.

21 Q Is the only way they could be locked through a central
22 locking mechanism?

1 MR. JOHNSON: Objection, foundation.

2 A It is my interpretation that that is how they are locked.

3 Q (BY MR. REEVES) Is that the only way that image could be
4 interpreted?

5 MR. JOHNSON: Objection, asked and answered.

6 You can --

7 THE WITNESS: Okay.

8 A It was the only way I interpreted it. And there is
9 nothing to imply otherwise. And he does not give a
10 reference to allow for interpreting it otherwise.

11 Q (BY MR. REEVES) Is this '656 Patent that Tsai sites in
12 that same section relevant to interpreting what Figure 16
13 and 17 show?

14 MR. JOHNSON: Objection, scope. Objection,
15 calls for speculation.

16 A The two structures are exceedingly different, so I would
17 not interpret it that way.

18 Q (BY MR. REEVES) How are they different?

19 MR. JOHNSON: Objection, scope. Objection,
20 calls for speculation.

21 A Tsai specifically says that the difference that he is
22 noting is the side supports, that he then incorporated in

1 his design.

2 Q (BY MR. REEVES) Where is he noting that?

3 MR. JOHNSON: Objection, scope. Objection,
4 calls for speculation.

5 A On page 2, lines 30 through 32.

6 Q (BY MR. REEVES) So Tsai doesn't say that there is any
7 difference between Figure 16 and 17 in the '656 Patent
8 with respect to the center support, right?

9 MR. JOHNSON: Objection, misstates evidence.

10 A Tsai does not refer to the locking mechanism in either --
11 Tsai does not specifically. And since the 16 and 17 are
12 the only two that are visible, and have no further
13 reference, my interpretation is based on what is in Tsai
14 -- what was available.

15 Q (BY MR. REEVES) So you didn't consider this '656 Patent
16 when you formed your opinion, is that fair?

17 A I considered what Tsai said about the '656 Patent.

18 Q But you didn't look at the '656 Patent, correct?

19 A I did not.

20 Q Looking back for a moment at Figure 17 of Tsai. I think
21 we have been talking about the -- what I think you called
22 the four scissoring members, I think they are marked B in

1 Figure 17. Does that sound right?

2 A Yes, as well as the central locking mechanism.

3 Q Those four scissoring members B are more or less

4 horizontal with the ground, right?

5 MR. JOHNSON: Objection, misstates evidence.

6 A Yeah, I was going to say that's going to cause -- you

7 can't tell from that drawing that that is the case -- one

8 way or the other. They could be angled up. They could

9 be flat. They could be at any orientation pretty much.

10 Q (BY MR. REEVES) Is that also true of Figure 16 of the

11 '738 Patent?

12 MR. JOHNSON: Objection, foundation.

13 Q (BY MR. REEVES) Let me -- let me ask that again. In

14 Figure 16 of the '738 Patent, can you tell whether the

15 inner retractable units 8 are angled up, angled down or

16 horizontal?

17 MR. JOHNSON: Objection, form.

18 A No, you cannot.

19 Q (BY MR. REEVES) Going back to Figure 17 of Tsai. This

20 central structure C raises the roof of the canopy above

21 the scissoring members B, right?

22 MR. JOHNSON: Objection, mischaracterizes

1 evidence. Objection, calls for speculation.

2 A That is not something I specifically addressed in the
3 declaration. However, it does raise the canopy above the
4 level of the legs.

5 Q (BY MR. REEVES) And it raises the canopy above the level
6 of the scissoring units B, right?

7 A Yes, it does.

8 MR. JOHNSON: Objection, calls for speculation.

9 Q And that -- that differs from Tsai's canopy in Figure 1,
10 for example, where -- where the canopy's supporting rods
11 3 are what holds up the canopy roof, correct?

12 A It does differ, yes.

13 Q Is that what you are referring to in paragraph 55 when
14 you say that the prior art solution, Figure 17, reduces
15 the head space within the structure?

16 MR. JOHNSON: Objection, mischaracterizes
17 evidence. And objection, foundation.

18 A What I am saying there is that the central locking
19 mechanism reduces the head space within the structure.
20 And that pole is part of the central locking mechanism,
21 as are parts E and F, I believe -- yes, E and F.

22 Q (BY MR. REEVES) Would it be fair to say that Figure 17

1 has reduced head space because the scissoring members B
2 are below the roof of the canopy, whereas Tsai has
3 increased head space because the canopy's supporting rods
4 3 are at the same level as the roof of the canopy?

5 MR. JOHNSON: Objection, mischaracterizes
6 evidence. And objection, calls for speculation.

7 A The head space is increased because the central locking
8 mechanism is not there, and the structure to support the
9 central locking mechanism inside.

10 Q (BY MR. REEVES) And the scissoring members B are part of
11 the structure to support what you are calling the central
12 locking mechanism, right?

13 A Yes, they are.

14 MR. JOHNSON: Objection, foundation.

15 Q (BY MR. REEVES) Let's take a look at paragraph 57 of
16 your declaration. In the first sentence of this
17 paragraph you say that a POSITA would see that it is
18 impossible to add the scissoring mechanism from Tsai to
19 the frame of Rousselle. Do you see that?

20 A I do.

21 Q You don't mean that it's physically impossible, right?

22 A No --

1 MR. JOHNSON: Objection, mischaracterizes
2 testimony.

3 A It is impossible because then it would be physically --
4 or it is impossible because it would be physically
5 impossible to deploy the tent -- or the structure if that
6 were the case. It would prevent legs 310 from undergoing
7 action 1, which is folding down.

8 Q (BY MR. REEVES) So you could physically build this, it
9 just wouldn't work, right?

10 A Yes -- yeah, you could do that all day long if you want
11 to. I don't know why you would want to. Maybe you are
12 going to use it as a stool?

13 Q Let's say you first performed action 1 and folded the
14 legs down. And then you attached the scissoring
15 mechanism. You would then have a canopy that would
16 otherwise work, it just wouldn't be able to undo action
17 1, right?

18 MR. JOHNSON: Objection. Form. Foundation.
19 Calls for speculation.

20 A It also would not be what's proposed by Rousselle. You
21 are making a major modification to what he teaches.

22 Q (BY MR. REEVES) You would be capable of making that

1 modification, though, right?

2 MR. JOHNSON: Same objections.

3 A At that point I would be inventing something.

4 Q (BY MR. REEVES) But it's possible, right, to make that
5 modification?

6 A Not according to what Tsai -- how -- excuse me, how
7 Rousselle describes his invention, no.

8 Q But you as a person of ordinary skill in the art, if you
9 had some reason to do that, you could do that, right?

10 MR. JOHNSON: Objection, calls for speculation.

11 And objection, foundation.

12 A It would be outside of the scope of the patent. And that
13 wasn't what I was asked to testify on.

14 Q (BY MR. REEVES) So you haven't formed an opinion as to
15 whether a person of ordinary skill in the art would be
16 able to make that modification to Rousselle?

17 MR. JOHNSON: Objection, foundation.

18 A No, I did not speculate on all the possible ways that we
19 could modify these patents, because at that point we are
20 doing engineering work. And we are designing something
21 new.

22 Q (BY MR. REEVES) Do you have -- do you have an opinion

1 sitting here today as to whether a person of ordinary
2 skill in the art would be able to make a modification to
3 Rousselle as I described?

4 MR. JOHNSON: Objection, foundation.
5 Objection, calls for speculation. Objection, scope.

6 A It certainly teaches away from Rousselle to do so.

7 Q (BY MR. REEVES) What is your basis for saying that?

8 A Because he clearly defines how that frame is to be
9 deployed in his teaching.

10 Q So your view is that if Rousselle discloses a way to do
11 it, Rousselle necessarily teaches away from any other way
12 of doing it, is that fair?

13 MR. JOHNSON: Objection, mischaracterizes
14 testimony.

15 A No, I'm just saying that what Rousselle said was, do it
16 this way. That was what Rousselle taught.

17 Q (BY MR. REEVES) Did Rousselle say, don't do it any other
18 way?

19 MR. JOHNSON: Objection, foundation.
20 Objection, calls for speculation.

21 A Not specifically. But at no time could a new invention
22 be created if every single invention were open to

1 whatever interpretation somebody chose to place upon it.
2 The wheel would have never been used if I couldn't apply
3 it to something else, and thereby get an invention that
4 would move things forward.

5 Q (BY MR. REEVES) Let me ask you this. What does teach
6 away mean to you?

7 A It means that the patent describes some feature, some
8 action in a particular way. And in doing so, leaves open
9 other ways to interpret it.

10 Q And is that the definition of teaching away that you used
11 preparing this declaration?

12 MR. JOHNSON: Objection, misstates evidence.

13 A Let me rephrase the definition I used slightly. Teaching
14 away means that the patent specifically says, don't do
15 this -- or says something is not appropriate, which is
16 different from what I'm discussing here, which is the
17 patent specifically does tell you to do something. And,
18 no, it does not exclude other ways of doing it. But in
19 the description of the patent, it clearly states how it
20 is intended to be used.

21 Q (BY MR. REEVES) So I'm not sure I understand that --
22 that answer because you say in the description of the

1 patent it clearly states how it is intended to be used.

2 Does that mean to you that the patent is teaching away
3 from other ways of doing it?

4 A No, I think I misspoke when I used the words teaching
5 away from. But he certainly does not suggest that you
6 should in any way, shape or form.

7 Q So just to be clear, your view is Rousselle does not
8 teach away from not inverting the legs, but doesn't
9 suggest that you should not invert the legs, is that
10 fair?

11 MR. JOHNSON: Objection, form. Objection,
12 misstates evidence.

13 A As Rousselle describes the invention, I believe that what
14 I have stated in paragraph 58 is true. Excuse me, that
15 should be paragraph 57, not 58.

16 Q (BY MR. REEVES) I just want to be really clear about
17 this. In your view, Rousselle does not teach away from
18 using legs that don't invert, right?

19 MR. JOHNSON: Objection, form. Objection,
20 misstates evidence.

21 A In every embodiment Rousselle shows in the patent the
22 legs first fold downward. And there are two or three

1 embodiments that do that.

2 Q (BY MR. REEVES) But that's not teaching away, right?

3 MR. JOHNSON: Objection, misstates evidence.

4 Asked and answered.

5 A It is teaching that. It is not teaching away. And I did
6 not state it's teaching away. Excuse me, I did not state
7 that in the declaration.

8 Q (BY MR. REEVES) Okay. Let's look at paragraph 58.

9 A Okay.

10 Q In here about halfway down you say, Rousselle's flexible
11 leg elements could neither support the weight of the
12 scissor elements, nor could they maintain those elements
13 in the unfolded position. Do you see that?

14 A Yes.

15 Q What is your basis for that statement?

16 A For the scissoring mechanism to act as a lock, it has to
17 be attached to something rigid. Otherwise, the non-rigid
18 members will just move allowing the scissoring mechanism
19 to move with it; therefore, you have got no locking
20 whatsoever -- you have got no structural support.

21 Q So that statement depends entirely on the idea that other
22 portions of Rousselle's canopy are flexible, right?

1 MR. JOHNSON: Objection, mischaracterizes
2 evidence.

3 A Not of the canopy, but of the frame.

4 Q (BY MR. REEVES) So you said for the scissoring mechanism
5 to act as a lock, it has to be attached to something
6 rigid, right?

7 MR. JOHNSON: Objection, mischaracterizes
8 testimony.

9 A That is true.

10 Q (BY MR. REEVES) Does it have to be perfectly rigid or
11 could there be some amount of flexibility?

12 MR. JOHNSON: Objection, foundation.

13 A Foundation of engineering is that everything is flexible.
14 I mean, the question is, does it deflect too much to be
15 able to support something, right? That's what
16 engineering is all about. But in Rousselle, it -- in
17 Rousselle, by saying that you are depending upon
18 potential energy to support the canopy, that implies that
19 we have enough flexibility to generate that potential
20 energy and, therefore, that we do have a non -- non-rigid
21 structure.

22 When I'm getting my students to understand

1 something like rigidity, I talk about, imagine that it's
2 made of jello. Now imagine that it's made of steel,
3 right? So we have that -- the two extremes. And there
4 is everything in between. This -- Rousselle depends upon
5 true flexure and creating those arched structures.

6 Q (BY MR. REEVES) You mentioned that Rousselle depends
7 upon potential energy. That's the potential energy
8 that's created by the structural members pressing against
9 the -- the outside of the canopy, right, the shell of the
10 canopy?

11 MR. JOHNSON: Objection, mischaracterizes
12 testimony.

13 A Which it does. The potential energy is stored within the
14 spring, which then is confined or constrained by the
15 canopy, thereby keeping it in that flexed position.

16 Q (BY MR. REEVES) So when that potential energy is stored
17 and constrained by the canopy, does the frame then become
18 rigid in that position?

19 MR. JOHNSON: Objection, foundation.
20 Objection, calls for speculation.

21 A No, it does not. Because if I go in, and I grab and I
22 pull, they will come in with me. They just form in a

1 different direction than what (indicating) --

2 Q (BY MR. REEVES) I want to look at paragraph 59 for a
3 second.

4 A Okay.

5 Q And in paragraph 59 you mention added weight, cost and
6 complications. Do you see that?

7 A Yes.

8 Q And that's the added weight, cost and complications of
9 adding additional supports between the legs of Rousselle,
10 right?

11 A Yes.

12 Q Do you know how much weight would be added?

13 A I don't.

14 Q Do you know how much cost would be added?

15 A No. But why would you add structure when something is
16 already structurally sound, which is the premise, the
17 original premise of that, if you read the main sentence.
18 The first sentence says, additionally, nothing in
19 Rousselle implies a need for additional support between
20 the leg tubes 310 of the structure. And so the second
21 sentence only adds additional disadvantages to doing
22 that. But the true disadvantage is, there is no need for

1 it, so why would you do it?

2 MR. REEVES: Does it make sense to take a break
3 for lunch?

4 (Off the record discussion).

5 (A recess was taken at 12:02 p.m.).

6 (Proceedings reconvened at 12:08 p.m.).

7 Q I want to go back to one thing just for a second, and I
8 don't think the record was perfectly clear. Looking back
9 at Figure 17 of Tsai. I, I understand that your
10 interpretation is that that central structure is a
11 central locking mechanism, is that fair?

12 A (Nods head).

13 Q There is nothing in Tsai that specifically says that,
14 right?

15 A You are correct.

16 Q Okay. I want to go to paragraph 61.

17 A Okay.

18 Q Actually, I don't want to go to paragraph 61. I want to
19 go to paragraph 62. In paragraph 62 you say -- this is
20 about two-thirds of the way down -- Tsai teaches against
21 a central locking mechanism because it indicates that the
22 central locking mechanism is not as effective as leg

1 locks. Do you see that?

2 A Yes.

3 Q And is the basis for that statement just the previous
4 part of that paragraph?

5 A Let me double check that just to be certain.

6 MR. JOHNSON: And I'm going to object,
7 misstates evidence.

8 A Yes, that paragraph is referring to the previous
9 paragraph.

10 Q (BY MR. REEVES) Sorry, do you mean sentence rather than
11 paragraph?

12 A It's referring to the prior paragraph where I discussed
13 Figure 16 and 17.

14 Q Okay. And that's paragraph 59 -- sorry, not 59 -- 55, is
15 that paragraph 55?

16 A Yes.

17 Q Okay. Let's take a look at paragraph 63. At the top of
18 page 24 you say, a central locking mechanism would allow
19 the legs/poles to move independently by simply flexing or
20 unflexing the canopy structure and canopy support rods 3
21 even with the central lock. Do you see that?

22 A Um-hmm, I do.

1 Q And you are talking about if a central locking mechanism
2 were used in Tsai's canopy, right?

3 A Yes.

4 Q So in that situation, your view is that the -- the outer
5 scissoring mechanisms could flex and unflex, right?

6 A Right.

7 MR. JOHNSON: Objection, misstates testimony.

8 Q (BY MR. REEVES) And the inner units -- or the inner --
9 sorry, the canopy support rods 3 is what I mean. The
10 canopy support rods 3 would also flex and unflex in that
11 situation, right?

12 MR. JOHNSON: Objection, foundation, and
13 misstates evidence.

14 Q (BY MR. REEVES) Let me say that again. That was very
15 confusing.

16 A Fair enough.

17 Q In the situation where one is using a central locking
18 mechanism in Tsai's canopy, that would -- your view is
19 that that would still allow the canopy support rods 3 to
20 flex, correct?

21 A That is correct.

22 Q Okay. In that situation would the canopy support rods 3

1 be able to fold up entirely into a folded configuration?

2 MR. JOHNSON: Objection, calls for speculation.

3 A That is not what I was saying. What I was saying is that
4 they would arch, they would flex.

5 Q (BY MR. REEVES) Do you have a view on whether they would
6 be able to fold up entirely into a folded configuration
7 if there was a central lock that was locked?

8 MR. JOHNSON: Objection, calls for speculation.

9 A I didn't refer to that at all. So you are asking if that
10 central -- would you rephrase that so I know exactly what
11 you are asking?

12 Q (BY MR. REEVES) Sure. If -- in a situation where you
13 have Tsai's canopy that -- and it includes a central lock
14 that's locked --

15 A Okay.

16 Q -- would those canopy support rods 3 be able to fold up
17 into their fully folded configuration?

18 MR. JOHNSON: I'm just going to object to
19 foundation, and calls for speculation. You can answer.

20 A Essentially, a central locking mechanism would not
21 prevent that structure from being collapsed as it stands.
22 It can't be collapsed to its fully collapsed position.

1 Q (BY MR. REEVES) So the central locking mechanism in that
2 situation would prevent it from being collapsed to its
3 fully collapsed position, correct?

4 MR. JOHNSON: Objection, calls for speculation.
5 You can answer.

6 A Yeah, that's -- yeah. Honestly, with Tsai's canopy,
7 Tsai's solution is the best solution.

8 Q (BY MR. REEVES) Well, I understand that that's your
9 view, but that's not what I'm asking. So what I'm asking
10 is, is if there was a central locking mechanism in Tsai,
11 that central locking mechanism when locked would prevent
12 the canopy supporting rods 3 from being fully collapsed,
13 right?

14 MR. JOHNSON: Objection, foundation. It calls
15 for speculation.

16 A It -- doing that changes the entire invention. And so I
17 would have to spend some time looking at it and
18 understanding it before I would be -- feel as though I
19 was qualified to answer that question. I mean, I spent a
20 lot of time reviewing these patents to ensure that I
21 fully understood what was being said and what was in
22 there. And that modification would modify it

1 considerably. And so it would take some time to -- to
2 think through that fully.

3 Q (BY MR. REEVES) When you say that modification, you mean
4 adding a central lock?

5 A Yes.

6 MR. JOHNSON: Object to mischaracterizes
7 testimony.

8 Q (BY MR. REEVES) So the modification of adding a central
9 lock to Tsai isn't something that you fully thought
10 through?

11 A Right.

12 MR. JOHNSON: Objection, mischaracterizes
13 testimony.

14 A Actually, I would like to say, yes, I did thoroughly
15 think through it. And because the frame is flexible at
16 that point -- regardless of whether I can collapse it all
17 the way or not, it is no longer functioning in the way it
18 is intended.

19 Q (BY MR. REEVES) Okay. But you are not sure sitting here
20 whether you would be able to collapse it all the way or
21 not if it had a central locking mechanism, is that right?

22 A I do not believe you could. But it will not function in

1 the way it's intended.

2 Q Okay. Let's look at paragraph 64. And in paragraph 64
3 you are talking about how Tsai discloses that the canopy
4 is unfolded and erected, is that fair?

5 A Yes.

6 Q And you say this teaches away from deploying the frame by
7 pushing upward on a central locking mechanism. Do you
8 see that?

9 A Yes.

10 Q What is your basis for that statement?

11 A Because if I -- imagine that you have these flexible
12 members, and you have legs. And you push up at the
13 center. All you are going to do is lift the whole thing
14 up (indicating).

15 Q So the basis for that statement goes back to those canopy
16 support rods 3 being flexible, right?

17 A Yes, it does.

18 MR. JOHNSON: Objection, mischaracterizes
19 testimony to the previous question.

20 Q (BY MR. REEVES) Okay. I want to look at paragraph 66.
21 And, and this paragraph is sort of summing up your
22 opinions throughout the declaration, right?

1 A Yes.

2 Q So you haven't offered any opinion in the declaration
3 about whether a particular limitation of Claim 1 is
4 disclosed or not by the prior art, is that fair?

5 MR. JOHNSON: Objection, mischaracterizes
6 testimony.

7 A I have written what I have written and shown, I believe
8 very clearly, that either the -- there would not be
9 motivation to combine the references, and even if the
10 references were combined, the resulting device would not
11 function.

12 Q (BY MR. REEVES) You don't specifically discuss any
13 particular limitation of Claim 1 in your declaration,
14 right?

15 MR. JOHNSON: Objection, mischaracterizes
16 testimony.

17 A Could you restate the question?

18 Q (BY MR. REEVES) Let me ask this instead. Your -- the
19 opinions you provide in the declaration are entirely
20 based on the idea that there is no motivation to combine
21 the references?

22 MR. JOHNSON: Objection, mischaracterizes

1 testimony.

2 A That is not true. It is based on, there is no motivation
3 to combine the references, and even if the references
4 were combined, the resulting device would not function.

5 Q (BY MR. REEVES) I see, okay. So that -- that is the
6 basis for your opinions in your declaration, is that
7 fair?

8 A Yes.

9 MR. JOHNSON: Objection, misstates evidence.

10 A I would say I would go back to paragraph 18. It is my
11 understanding that in determining whether a claimed
12 invention is obvious, one should consider the scope and
13 content of the prior art, the level of ordinary skill in
14 the relevant art, the differences between the claimed
15 invention and prior art, and whether the claimed
16 invention would have been obvious to one of ordinary
17 skill in the art in light of those differences. As well
18 as the lack of motivation to combine and -- so going back
19 to -- and paragraph 23, it is my understanding that if a
20 proposed modification to a reference would render the
21 prior art unsatisfactory for the intended purpose, or if
22 the prior art teaches away from the proposed

1 modification, then there is no suggestion or motivation
2 to make the proposed modification.

3 Also paragraph 24, it is my understanding that
4 if a proposed modification or combination of prior art
5 references would change the principle of operation of the
6 prior art being modified, then the teachings of the
7 references are not sufficient to render the claim prima
8 facie obvious. Those are the sections I was basing my
9 opinion on.

10 MR. REEVES: I have no further questions.

11 MR. JOHNSON: Okay. I don't believe we are
12 going to need redirect, but can we just take a -- ten
13 minutes?

14 MR. REEVES: Sure.

15 (A recess was taken at 12:34 p.m.).

16 (Proceedings reconvened at 12:43 p.m.).

17 MR. JOHNSON: We don't have any redirect. And
18 I guess we get an opportunity to read and sign, is that
19 -- or not so much?

20 MR. REEVES: I'm not sure we will have time
21 within the week, but --

22 MR. JOHNSON: That's true. You are right. So

1 I don't have anything else.

2 MR. REEVES: Thank you everyone for your time.

3 COURT REPORTER: Do you both need copies?

4 MR. JOHNSON: Yes, ma'am.

5 COURT REPORTER: How would you like that

6 delivered, .pdf or .ptx?

7 MR. JOHNSON: A .pdf is good.

8 MR. REEVES: Great for me, too.

9 COURT REPORTER: Thank you.

10

11 (The deposition was concluded at 12:45 p.m.)

12

13

14

15

16

17

18

19

20

21

22

1 CERTIFICATE

2 STATE OF MICHIGAN)

3) ss

4 COUNTY OF BERRIEN)

5 I certify that this transcript, consisting of
6 68 pages is a complete, true, and correct record of the
7 testimony of WENDY S. REFFEOR held in this case on
8 January 24, 2024.

9 I also certify that prior to taking this
10 deposition the witness was duly sworn to tell the truth.

11 I also certify that I am not a relative or
12 employee of or an attorney for a party, or financially
13 interested in the action.

14 In witness whereof I have hereunto set my hand
15 this 25th day of January, 2024.

16



17

Karyn S. Schultz (CSR-4269)

18

Notary Public in and for

19

Berrien County, Michigan

20

21

My commission expires 10-5-2025

22

1 Wendy S. Reffeor, c/o
Schmeiser, Olsen & Watts

2 18 E. University Drive, Ste. 101
Mesa, Arizona 85201

3
Case: Global Shade Corp. v. With-U E-Commerce (Shanghai) Co., Ltd.

4 Date of deposition: January 24, 2024

Deponent: Wendy S. Reffeor

5

6 Please be advised that the transcript in the above
referenced matter is now complete and ready for signature.

7 The deponent may come to this office to sign the transcript,

8 a copy may be purchased for the witness to review and sign,

9 or the deponent and/or counsel may waive the option of

10 signing. Please advise us of the option selected.

11 Please forward the errata sheet and the original signed

12 signature page to counsel noticing the deposition, noting the

13 applicable time period allowed for such by the governing

14 Rules of Procedure. If you have any questions, please do

15 not hesitate to call our office at (202)-232-0646.

16

17

18 Sincerely,

19 Digital Evidence Group

20 Copyright 2024 Digital Evidence Group

21 Copying is forbidden, including electronically, absent

22 express written consent.

1 Digital Evidence Group, L.L.C.

1730 M Street, NW, Suite 812

2 Washington, D.C. 20036

(202) 232-0646

3

4 SIGNATURE PAGE

Case: Global Shade Corp. v. With-U E-Commerce (Shanghai) Co., Ltd.

5 Witness Name: Wendy S. Reffeor

Deposition Date: January 24, 2024

6

I do hereby acknowledge that I have read

7 and examined the foregoing pages

of the transcript of my deposition and that:

8

9 (Check appropriate box):

() The same is a true, correct and

10 complete transcription of the answers given by
me to the questions therein recorded.

11 () Except for the changes noted in the

attached Errata Sheet, the same is a true,

12 correct and complete transcription of the

13 answers given by me to the questions therein

14 recorded.

15

16

17 _____
DATE

WITNESS SIGNATURE

18

19

20

21

22 _____
DATE

NOTARY

1 Digital Evidence Group, LLC
2 1730 M Street, NW, Suite 812
3 Washington, D.C. 20036
4 (202)232-0646

5

6 ERRATA SHEET

7

8 Case: Global Shade Corp. v. With-U E-Commerce (Shanghai) Co., Ltd.

9 Witness Name: Wendy S. Reffeor

10 Deposition Date: January 24, 2024

11 Page No. Line No. Change

12

13

14

15

16

17

18

19

20

21

22

Signature

Date

A	ahead 6:10 16:5 27:22 37:4 42:2 44:16	APPEAL 1:1	55:14	better 20:21
a.m 1:17 4:4	air 11:21	appear 48:11,13	Avenue 1:15 2:6	biased 51:22
23:21,22 41:22	allow 21:17 26:13	APPEARANC...	avoid 6:1	big 36:7
42:1	28:14,15,16	2:1	aware 5:14 9:1	bit 7:6 8:4,10
able 5:1 19:21	54:10 69:18	applicability	52:7	11:5,12 13:6
20:17 29:12	70:19	52:7	axes 35:10	27:22
41:8 59:16	allowed 20:12	applicable 80:13	axis 19:7 21:17	blue 22:1
60:16 61:2	80:13	application 45:7	B	BOARD 1:1
65:15 71:1,6,16	allowing 64:18	applied 37:16	B 55:22 56:3,21	body 33:10
73:20	allows 20:15 36:1	apply 62:2	57:6 58:1,10	bottom 19:2
absent 80:21	36:19	appropriate	back 17:20 24:1	box 81:9
abso 44:15	alternatives 32:1	62:15 81:9	25:17 27:3 28:9	brand 12:16
absolutely 5:21	Amazon 8:7	approximately	33:12 34:17	break 5:18,19
8:2,2,18 9:8	12:14	9:11	39:9 45:5 48:18	23:18 24:1
10:8,11 23:2	amend 9:2,4	arch 71:4	55:20 56:19	41:21 42:4
32:4 44:17	amended 45:10	arched 48:17	68:7,8 74:15	50:10 68:2
abutment 51:22	45:14 46:4,4,8	66:5	76:10,18	broad 35:11
accurate 5:2	46:8	Arizona 2:16	bad 40:10,15,21	build 59:8
acknowledge	amendments 9:7	80:2	band 34:16 35:7	building 20:21
81:6	amount 20:17	art 15:12 39:19	35:8 37:16,20	button 51:22
act 19:12 64:16	65:11	47:8 48:22 49:2	38:6 39:2	C
65:5	analysis 26:11	53:16 57:14	bar 35:8,8	C 4:1 56:20
action 30:2,10	27:6,20 45:19	60:8,15 61:2	bars 34:16 37:17	C.V 10:14,17,19
59:7,13,16 62:8	46:15	75:4 76:13,14	37:20 38:6 39:2	12:3
79:13	and/or 80:9	76:15,17,21,22	based 16:3,4 21:1	c/o 80:1
add 58:18 67:15	angle 35:7,9,16	77:4,6	50:6 55:13	call 25:14 42:15
added 67:5,8,12	36:19 37:1	asked 16:12,22	75:20 76:2	80:15
67:14	angled 35:16	32:13 54:5	basically 11:10	called 7:19 44:22
adding 50:6 67:9	56:8,15,15	60:13 64:4	basing 7:18 77:8	48:4 55:21
73:4,8	angles 35:19 36:1	asking 30:10,11	basis 48:13 61:7	calling 58:11
addition 28:20	36:2,5	33:5 44:4 46:4	64:15 69:3	calls 9:14 14:11
additional 67:9	answer 6:10	46:7 71:9,11	74:10,15 76:6	20:1,19 28:8
67:19,21	14:12 20:21	72:9,9	Bear 2:5	30:6,18 31:13
additionally	21:13 29:10	assembly 24:18	begins 34:5 36:16	33:8,17 34:14
37:17 67:18	30:18 33:18	25:17,20 26:3	37:11	40:17 41:11
address 4:15	41:12 43:19	26:12	believe 10:13	43:9,17 50:3
16:10 43:10	62:22 71:19	assisting 37:18	14:15 17:16	52:5,19 53:6
addressed 57:2	72:5,19	assistive 12:7	20:2 22:5,7	54:15,20 55:4
addresses 16:7	answered 54:5	assume 6:5	27:16 38:17	57:1,8 58:6
16:18 17:9 26:9	64:4	attached 19:17	40:1 43:10	59:19 60:10
adds 67:21	answering 32:12	20:11 59:14	53:15,18 57:21	61:5,20 66:20
admitted 28:19	answers 6:1	64:17 65:5	63:13 73:22	71:2,8,19 72:4
adult 11:8	81:10,13	81:11	75:7 77:11	72:14
advise 80:10	anyway 6:10	attorney 6:8 9:10	Berrien 79:4,19	canopies 11:3,4
advised 9:3 80:6	apologize 25:16	79:12	best 7:16 10:9	12:13,16 13:1,6
affect 26:10		automated 12:2	20:7 33:20 72:7	canopy 13:12,18
33:14		available 8:9		

14:4,8,14,15 15:13 17:12 18:3,11,19 22:20 26:4,13 30:4,11,14 31:3 32:6,16,18 33:4 33:7,10,13 34:12,21 39:7 40:4,14 41:5,5 42:7,10 43:8 44:14 45:1 46:18 49:8,22 53:10 56:20 57:3,5,9,11 58:2,4 59:15 64:22 65:3,18 66:9,10,15,17 69:20,20 70:2,9 70:10,18,19,22 71:13,16 72:6 72:12 74:3,15 canopy's 57:10 58:3 cans 45:4 capable 59:22 careful 43:18 carefully 12:20 case 8:14,18,20 9:1 10:20 11:2 11:15,20 12:4 13:1 56:7 59:6 79:7 80:3 81:4 82:8 cause 56:6 caused 37:18,21 ceiling 28:22 36:18 center 53:11 55:8 74:13 central 16:16 18:4 20:16 22:18,22 23:2 30:3,14 33:14 49:9,11,16 53:12,13,21 56:2,20 57:18 57:20 58:7,9,11	68:10,11,21,22 69:18,21 70:1 70:17 71:7,10 71:13,20 72:1 72:10,11 73:4,8 73:21 74:7 certain 21:1 28:20 32:12 42:12 69:5 certainly 12:5 17:18 61:6 63:5 CERTIFICATE 79:1 Certified 1:14 certify 79:5,9,11 cetera 34:7 chance 29:7 39:15 change 29:9 77:5 82:11 changes 72:16 81:11 check 22:7 69:5 81:9 chose 62:1 circled 22:1 cite 39:10 claim 16:12,12 16:13,13,17,22 18:12 22:18 27:8 32:2,5,14 33:5,6,9 46:4,5 46:8,8 75:3,13 77:7 claimed 15:6 76:11,14,15 claims 9:2 17:3 45:10,14,20 46:5 clarify 19:10 25:3 claws 45:4 clear 63:7,16 68:8 clearly 31:14 32:19 33:11 36:12,13,22	37:17 61:8 62:19 63:1 75:8 clips 29:15 close 36:6,7 closer 36:1 collapse 73:16,20 collapsed 32:20 32:22 71:21,22 71:22 72:2,3,12 collapsible 11:3,4 11:5,6 12:9 13:1 14:18,22 15:4 18:3 24:10 24:16 column 17:10,14 17:15 28:18 29:2,5 32:18 33:21 34:2 35:2 36:16 37:20,22 38:1 39:11 51:12,19 combination 77:4 combine 75:9,20 76:3,18 combined 75:10 76:4 come 45:4 66:22 80:7 commencing 1:16 comment 15:20 15:21 commission 79:21 complete 40:6 79:6 80:6 81:10 81:12 complex 42:15 complications 67:6,8 composed 49:8 concluded 78:11 condition 51:21 conducted 45:19 configuration 71:1,6,17	confined 66:14 confusing 70:15 conjunction 10:20 connected 19:22 49:9 connecting 27:18 35:10 connection 6:18 8:14 13:1 consent 80:22 consider 27:5,19 55:15 76:12 considerably 73:1 considered 46:14 55:17 consistent 45:14 consisting 79:5 constrained 66:14,17 content 76:13 context 34:15 continue 24:7 39:18 contradiction 29:16 38:17 contradicts 29:12 contrasts 38:12 conventional 36:21 Coopersville 4:16 copies 78:3 copy 9:20 17:5 24:4 80:8 Copying 80:21 Copyright 80:20 corner 36:18 Corp 80:3 81:4 82:8 CORPORATI... 1:3 correct 10:4,10 22:8,8,11 27:13 55:18 57:11 68:15 70:20,21	72:3 79:6 81:9 81:12 corrections 10:17 cost 67:5,8,14 counsel 5:4,5,6,7 5:8 9:17 24:2 42:4 80:9,12 counting 27:3 County 79:4,19 couple 11:21 25:1 course 16:13 41:15 court 4:21 5:22 78:3,5,9 cover 5:17 28:3,6 28:12,21 29:13 covering 28:17 create 30:2 35:16 created 61:22 66:8 creating 17:11 28:4 53:12 66:5 credentials 8:10 criteria 13:12,17 13:18,22 cross 34:16 CSR-4269 1:14 79:17 curiosity 7:9 curious 8:11 current 26:11 D D 2:4 4:1 D.C 1:21 81:2 82:3 Date 80:4 81:5,17 81:22 82:10,22 day 59:10 79:15 days 7:15 deal 36:7 dealt 11:4,7 decided 7:16 declaration 6:18 6:22 8:1,15 9:7 9:21 10:1,6,14
---	---	---	--	---

10:21 13:8 17:20 24:8 26:8 27:9 34:17 39:10 42:2 43:20 44:2,3,5 44:13 47:15 48:18 57:3 58:16 62:11 64:7 74:22 75:2 75:13,19 76:6 defines 31:14 61:8 definitely 41:17 definition 62:10 62:13 deflect 65:14 degree 23:15 35:16 degrees 23:7,12 35:11,11,13,13 35:17,19 36:1,3 36:3,4,4,10 37:16 delivered 78:6 depending 65:17 depends 29:18 48:10 64:21 66:4,6 deploy 59:5 deployed 61:9 deploying 74:6 deponent 80:4,7 80:9 deposed 4:18 13:3 deposition 1:13 5:9 9:9,18 51:8 78:11 79:10 80:4,12 81:5,7 82:10 describe 18:6 20:8 22:22 24:19 31:11 33:6,11 42:10 49:6,6 described 15:13 34:8 37:15 61:3	describes 22:18 24:16 25:2,20 26:1 32:6,15 33:4 37:17 40:6 40:7 42:13 60:7 62:7 63:13 describing 31:2 38:18 39:3 52:3 description 31:14 31:21 41:3 62:19,22 design 12:6 30:15 34:11 55:1 designed 11:8 12:8 53:11 designing 60:20 designs 8:8 34:9 36:21 desired 29:1 36:5 detail 27:18 determining 76:11 device 42:14 44:18 45:1,7 75:10 76:4 devices 12:7 44:8 44:14,17 45:5 differ 57:12 difference 54:21 55:7 differences 76:14 76:17 different 7:6 8:8 15:9 25:1,9,15 26:20 27:5 38:19 42:18 43:1 54:16,18 62:16 67:1 differs 57:9 Digital 1:20 80:19,20 81:1 82:1 dimension 20:15 dimensional 20:3 20:14 direction 67:1 directly 12:7,12	15:20 disabled 11:9 disadvantage 67:22 disadvantages 67:21 disappearing 42:5 disclosed 30:15 46:2 51:1 75:4 discloses 26:3,22 28:11 31:16 34:12 35:18 43:6 44:8 61:10 74:3 disclosing 43:3 45:21 52:17,20 disclosure 44:9 45:15 46:15 discuss 24:1 42:3 75:12 discussed 28:21 44:12 46:10,11 69:12 discusses 32:18 38:5 40:4 discussing 27:10 34:16,20 37:19 38:8 39:6 42:7 42:11 50:20 51:9 62:16 discussion 68:4 disparagement 48:22 distinguish 40:9 document 5:12 16:13 48:8,15 documents 9:10 9:12 doing 60:20 61:12 62:8,18 63:3 67:21 72:16 dome 36:21 double 22:7 69:5 downward 63:22 Dr 4:11	dramatically 38:19 drawing 56:7 Drive 2:15 4:16 80:2 due 37:16 duly 4:6 79:10 E E 2:15 4:1,1 57:21,21 80:2 E-Commerce 1:6 80:3 81:4 82:8 ease 16:8 effective 68:22 either 23:3 43:3 48:9 55:10 75:8 electronically 80:21 element 48:16 elements 35:12 35:14 46:19 47:1 64:11,12 64:12 embodiment 24:19 25:5,6,9 27:16,17,19 31:21 32:21,22 38:8 42:18 43:4 43:4 48:17 63:21 embodiments 25:1,15 26:21 27:6 28:20 30:15 34:8,9,11 37:9 38:18 43:6 43:7,14 44:10 44:10,12 64:1 employed 30:12 employee 79:12 enables 36:17 energy 37:18,22 65:18,20 66:7,7 66:13,16 engineering 60:20 65:13,16 engineers 41:16	ensure 22:19 23:1 72:20 entire 17:11 21:2 40:5 45:22 50:5 72:16 entirely 64:21 71:1,6 75:19 equipment 12:2 erected 14:19 24:11 74:4 erecting 37:19 51:21 erection 16:8 errata 80:11 81:11 82:6 essentially 8:17 18:22 29:11 71:20 et 34:7 evidence 1:20 26:7 32:9 34:14 35:21 38:15 42:22 46:22 47:2,5,6 49:19 52:13 55:9 56:5 57:1,17 58:6 62:12 63:12,20 64:3 65:2 69:7 70:13 76:9 80:19,20 81:1 82:1 exactly 28:18 32:13 71:10 examination 3:2 4:9 43:18 examined 4:7 12:22,22 81:7 example 8:16 37:19 46:9 57:10 examples 11:6,19 17:8 25:1 46:1 exceedingly 54:16 exclude 62:18 excuse 23:15 25:16 60:6
---	--	---	--	---

63:14 64:6 exemplary 34:9 exhaustive 13:20 Exhibit 3:7 9:21 17:6 24:5,6 51:5,8 EXHIBITS 3:6 expect 8:17 experience 11:2 11:14 12:5 16:4 21:1 expert 8:9,13,15 8:19 13:4 experts 8:11 expires 79:21 explain 37:8 express 80:22 extensively 34:7 extra 19:5 extremes 66:3	39:3 42:16,18 43:1,3,4 47:20 49:4,7,8 51:20 52:10 53:2,4,7 53:9 54:12 55:7 55:20 56:1,10 56:14,19 57:9 57:14,22 68:9 69:13 figures 22:4 24:22 32:19 35:13 38:12 47:3,11 49:5 51:3 file 7:10 8:20 filed 10:22 financially 79:12 find 10:11,16 14:2 fine 40:12 first 4:6 8:11 35:6 51:15 58:16 59:13 63:22 67:18 fixed 19:2 20:5,9 20:10 flat 35:15 56:9 flex 37:21 70:5 70:10,20 71:4 flexed 37:16 66:15 flexibility 40:3 41:1 48:16 65:11,19 flexible 39:20 40:3,14 41:9 46:19 47:1,11 48:7,7,10,12,14 64:10,22 65:13 73:15 74:11,16 flexing 37:18 69:19 flexure 37:20 38:5 39:2,7,8 66:5 flip 17:20 34:17 flipped 24:14	floor 28:19 fold 33:14 63:22 71:1,6,16 folded 59:13 71:1 71:6,17 folding 59:7 folds 31:3 follow 7:17 follows 4:7 forbidden 80:21 force 28:3 48:10 50:1 forces 28:21 29:13,20,21 30:1,4 37:16 40:4 foregoing 81:7 forget 24:4 form 15:10 18:21 25:13 30:5,17 31:12,19 37:8 39:22 40:22 43:21 44:16 45:16 46:12 47:13 56:17 59:18 63:6,11 63:19 66:22 formed 35:7,9 55:16 60:14 forward 62:4 80:11 found 8:15 46:13 47:14 foundation 15:3 16:20 19:9 20:20 21:6,12 25:11 27:7 28:13 29:22 30:5,17 31:12 31:19 33:18 37:5 39:4,22 41:10 43:15 45:17 46:3 49:13,18 54:1 56:12 57:17 58:14 59:18 60:11,17 61:4	61:19 65:12,13 66:19 70:12 71:19 72:14 four 26:20 55:22 56:3 Fourth 2:6 frame 13:12,19 14:4,8,14,15,19 16:7,8 17:9,11 18:3 22:19 23:1 24:11,17 28:2,3 28:5,12,15 30:10 31:15 34:21 37:18 40:14 42:7,10 51:1,2 52:10 58:19 61:8 65:3 66:17 73:15 74:6 frames 11:11 12:8,9 14:18,22 15:4 24:10 freedom 23:7,12 23:15 full 4:13 fully 71:17,22 72:3,12,21 73:2 73:9 function 73:22 75:11 76:4 functioning 73:17 further 12:1 55:12 77:10	given 9:6 17:16 81:10,13 gives 31:21 giving 46:9 Global 1:3 80:3 81:4 82:8 go 6:10 11:22 35:22 37:4 44:16 45:4 48:18 66:21 68:7,16,18,19 76:10 goes 11:18 17:13 17:14 36:12,13 74:15 going 5:9,17 6:13 9:19 17:5 20:4 20:22 21:19 24:7 26:18 27:3 31:8 32:9 38:15 39:9 43:15 47:8 47:13 51:5 56:6 56:6,19 59:12 69:6 71:18 74:13 76:18 77:12 good 4:11,12 23:19 40:10,15 41:21 42:5 78:7 governing 80:13 grab 45:4 66:21 grabber 45:4 grabbing 20:22 Grand 1:15 4:3 Great 78:8 ground 5:17 56:4 Group 1:20 80:19,20 81:1 82:1 guarantee 17:19 guess 5:5 11:12 20:21 25:4 36:15 41:18 44:3 45:18 77:18
F				
F 57:21,21 facie 77:8 fact 37:15 50:5 failed 15:16 fair 5:20 6:6,11 6:16 7:22 17:2 20:16 22:10 23:17 26:14 31:3,4 38:13 42:8 45:2 46:2 55:16 57:22 61:12 63:10 68:11 70:16 74:4 75:4 76:7 familiarize 8:8 far 36:1 Farms 4:16 feature 62:7 feel 72:18 figure 22:4,5,5,5 22:9,9,12,21 25:5,5,8,12,14 25:14,14,15 27:12,17,19 35:15 38:9,12				
				G
			G 4:1 game 45:2 general 13:7 39:7 generally 8:12 generate 65:19 getting 7:14 65:22 give 5:2 7:1 17:5 24:4 25:1 31:22 46:18,22 47:2,5 47:6 54:9	
				H

halfway 64:10 hand 5:9 22:4,5,9 24:5 79:14 happen 7:19 28:5 happens 10:13 hard 14:2 head 6:3 15:15 57:15,19 58:1,3 58:7 68:12 held 79:7 help 21:4,10 hereunto 79:14 hesitate 80:15 hinge 35:9 hinges 34:20 35:18 37:15 history 7:10 holds 57:11 hole 52:1,2 honestly 26:17 72:6 hope 6:14 horizontal 56:4 56:16 hose 11:21 hour 9:16 hours 7:1 9:13	imply 37:9 54:9 impossible 58:18 58:21 59:3,4,5 improvement 51:2 52:14 included 27:12 includes 52:14 53:13 71:13 including 80:21 incorporated 54:22 increase 36:19 increased 58:3,7 independently 69:19 INDEX 3:1 indicates 68:21 indicating 20:9 67:1 74:14 information 36:6 46:13 47:15 inner 18:12,17,17 19:6,17,20 20:17 21:5,10 21:18,21 22:9 22:12 30:10 48:4,6 56:15 70:8,8 inside 28:2,16 29:17,18 36:20 58:9 installed 28:2,5 installing 28:11 instance 35:12 instances 35:14 instructed 7:17 instructs 6:11 integral 41:2 intended 13:12 13:19 14:5,9,22 15:9,16 48:11 48:14 62:20 63:1 73:18 74:1 76:21 interested 25:8 79:13 interesting 12:10	internal 49:9 interpret 53:17 54:17 62:9 interpretation 38:20 46:22 47:9 53:7,8 54:2 55:13 62:1 68:10 interpreted 54:4 54:8 interpreting 54:10,12 intruded 14:19 15:6,13 24:11 invent 44:18 50:7 inventing 60:3 invention 32:22 36:1,17 41:17 41:19 44:22 60:7 61:21,22 62:3 63:13 72:16 76:12,15 76:16 invert 33:13 63:9 63:18 inverting 31:5,10 63:8 involves 31:22 inward 19:1 IPR 6:19 IPR2023-00580 1:5 issues 16:7,10,17 items 12:12	15:18 16:11,20 18:8,20 19:9,15 20:1,19 21:6,12 23:10 25:11,13 26:6,15,18 27:1 27:7 28:7,13 29:4,6,22 30:5 30:17 31:8,12 31:19 32:8,17 33:8,17 34:1,3 34:13 35:20 37:3,5 38:14 39:4,22 40:17 40:22 41:10 42:21 43:9,15 44:16 45:16 46:3,12,20 47:13 49:13,18 50:3,17,19 51:16 52:4,12 52:18 53:5 54:1 54:5,14,19 55:3 55:9 56:5,12,17 56:22 57:8,16 58:5,14 59:1,18 60:2,10,17 61:4 61:13,19 62:12 63:11,19 64:3 65:1,7,12 66:11 66:19 69:6 70:7 70:12 71:2,8,18 72:4,14 73:6,12 74:18 75:5,15 75:22 76:9 77:11,17,22 78:4,7	28:11 29:7 39:14,15 43:6 45:3 47:16 48:6 49:11,16 50:15 51:13 59:11 67:12,14 71:10 knowledge 10:9 33:20
L				
L-A-M-O-N-T				
4:16				
L.L.C 81:1				
lack 76:18				
LaMont 4:16				
large 20:13				
lateral 18:5,7				
19:5				
leaf 51:22				
leaves 62:8				
left 22:4,9				
leg 20:12 31:6				
34:6,11 35:8,8				
50:2,4,6,7 52:1				
52:3,17 53:2,3				
53:4 64:11				
67:20 68:22				
legs 16:14 18:5,7				
18:14,18 19:1,3				
19:13,17,20				
21:5,11,17 23:6				
30:2 33:13				
37:21 39:20				
40:5,5 41:5				
57:4 59:6,14				
63:8,9,18,22				
67:9 74:12				
legs/poles 69:19				
let's 12:9 14:8				
16:5 17:20 24:8				
25:14 30:22				
32:21 34:17				
35:5 38:4 39:14				
41:4 47:17,20				
49:5 58:15				
59:13 64:8				
69:17 74:2				

level 57:4,5 58:4 76:13 lift 23:16 74:13 lifts 11:8 45:3 light 76:17 limit 45:20 limitation 75:3 75:13 limited 14:18 24:10 limiting 44:9 line 17:14,15 28:18,19 33:21 33:22 34:2,5 35:22 36:10,16 37:12 38:11 51:12,19 82:11 lines 17:10,15 29:2,5 35:2 37:20,22 38:1 39:11 50:14 55:5 linkage 49:21 53:10 linkages 53:19 list 13:11,17,20 listed 26:20 little 7:6 8:10 LLC 82:1 lock 18:4,10,13 18:16 20:16 22:19,22 23:2 30:3,14 33:15 49:21 52:3 53:11 64:16 65:5 69:21 71:7 71:13 73:4,9 locked 18:4,10 20:17 23:2 53:20,21 54:2 71:7,14 72:11 locking 11:13,14 11:17,19,22 12:1,10 16:7,16 24:17 27:10,15 49:10,11,17,21 53:12,14,22	55:10 56:2 57:18,20 58:7,9 58:12 64:19 68:11,21,22 69:18 70:1,17 71:20 72:1,10 72:11 73:21 74:7 locks 50:2,4,6,7 52:17 53:2,3,4 69:1 long 9:11,14 28:17,20 49:15 59:10 longer 73:17 look 7:10 8:19 17:22 18:10 20:2 24:8 29:2 30:22 33:21 34:18 35:5 37:10 38:4 39:14 45:2 47:17,20 48:19 49:5 50:13 51:12 55:18 58:15 64:8 67:2 69:17 74:2,20 looked 7:6 8:4,7 12:13 looking 12:20 24:22 25:4,17 33:12 50:13 55:20 68:8 72:17 lost 51:17 lot 11:10 20:4 72:20 loud 22:16 24:9 28:1 34:4 lunch 68:3	maintained 51:21 major 59:21 making 59:21,22 manner 35:7 marginal 51:2 52:14 mark 51:5 marked 47:22 51:8 55:22 Martens 2:5 material 11:17 materials 12:6 mating 52:2 matter 50:5 80:6 mean 5:5 11:10 14:1 15:16 29:13 36:12 40:20 48:9 58:21 62:6 63:2 65:14 69:10 70:9 72:19 73:3 means 19:6 51:21 51:22 62:7,14 mechanism 11:13,22 16:16 18:11 24:17 27:10,15,18 40:7 49:21 53:12,14,22 55:10 56:2 57:19,20 58:8,9 58:12,18 59:15 64:16,18 65:4 68:11,21,22 69:18 70:1,18 71:20 72:1,10 72:11 73:21 74:7 mechanisms 11:14,17,19 12:1,10 49:9 70:5 member 41:6,8 47:22 members 18:4,6 21:4,10 23:4,5	30:11 35:10 55:22 56:3,21 58:1,10 64:18 66:8 74:12 mention 67:5 mentioned 12:13 15:5 25:17 31:5 66:6 merely 34:9 Mesa 2:16 80:2 Michigan 1:16 4:3,17 79:2,19 mind 22:17 minute 16:1 33:12 40:10 46:17 47:18 minutes 77:13 mischaracterizes 13:15 15:18 18:8,20 19:15 23:10 26:6,15 27:1 31:9 32:8 34:13 35:20 38:14 42:21 46:20 52:12 56:22 57:16 58:5 59:1 61:13 65:1,7 66:11 73:6,12 74:18 75:5,15,22 misspoke 63:4 misstates 49:19 55:9 56:5 62:12 63:12,20 64:3 69:7 70:7,13 76:9 modification 59:21 60:1,5,16 61:2 72:22 73:3 73:8 76:20 77:1 77:2,4 modified 77:6 modify 60:19 72:22 moment 25:16 55:20 Monroe 1:15	morning 4:11,12 motion 9:2,4 18:15 23:3,4,5 23:8,9 31:6,10 31:22 32:1,3 motions 23:6 40:6 motivation 75:9 75:20 76:2,18 77:1 move 18:13,14,14 18:17,18,18 19:7 21:19 42:2 62:4 64:18,19 69:19
N				
N 4:1 name 4:13 81:5 82:9 NATHAN 2:4 Nathan.reeves... 2:9 near 36:19 necessarily 11:17 44:19 61:11 necessary 28:18 28:21 29:13,20 29:21 30:1 need 5:18 14:4 18:19 19:5,10 43:21 67:19,22 77:12 78:3 needed 10:17 neither 64:11 never 26:17 62:2 new 60:21 61:21 night 10:12 Nods 6:3 15:15 68:12 non 65:20 non-rigid 64:17 65:20 notably 36:2 Notary 1:15 79:18 81:22 noted 34:6 36:5				

81:11 notice 1:17 5:10 5:15 noticed 45:9 noticing 80:12 noting 54:22 55:2 80:12 number 6:14 27:4 45:3 50:21 51:6 NW 1:21 81:1 82:2	57:1,8,16,17 58:5,6,14 59:1 59:18 60:10,11 60:17 61:4,5,5 61:13,19,20 62:12 63:11,11 63:19,19 64:3 65:1,7,12 66:11 66:19,20 70:7 70:12 71:2,8 72:4,14 73:12 74:18 75:5,15 75:22 76:9 objections 60:2 obvious 76:12,16 77:8 occasions 17:17 17:18 occur 17:18 18:15 occurs 17:17 offered 75:2 office 1:1 80:7,15 Oh 16:2 22:16 25:7 37:4 44:1 45:22 Ohnishi 7:20 8:1 okay 5:1,11 6:8 6:12 7:5,8,22 8:13 9:6,11,14 9:17,20,22 10:16,19,21 12:13,16,19 13:6,11 14:13 15:22 16:2 17:7 17:21 20:10 21:19 23:14,20 25:7,10,12 27:17,22 31:1 33:2,19 34:19 35:5 37:6,10,13 39:18 40:12 41:7 42:6 44:15 47:19,21 48:20 50:19 51:7,14 51:17,20 54:7 64:8,9 67:4	68:16,17 69:14 69:17 70:22 71:15 73:19 74:2,20 76:5 77:11 Olsen 2:14 80:1 Olson 2:5 omitted 29:1 once 17:22 18:4 18:10,13,13,16 18:17 23:2,6 41:20 ones 17:19 43:13 44:20 open 61:22 62:8 operation 33:14 77:5 opinion 7:18 15:21 16:3,4 21:15 29:9,17 43:12,22 44:1 46:18 47:7 55:16 60:14,22 75:2 77:9 opinions 8:1,3 9:6 17:2 74:22 75:19 76:6 opportunity 77:18 opposed 47:11 optimal 15:7,8,14 option 80:9,10 optional 26:1,10 28:20 order 40:5,6 49:21 ordinary 39:19 40:2 47:7 53:16 60:8,15 61:1 76:13,16 orientation 53:19 56:9 original 67:17 80:11 outer 18:19,22 19:12 70:4 outside 28:5,12	28:16,16 29:14 29:17,19 60:12 66:9 outward 19:1 28:3 owner 1:8 2:12 9:1 P P 4:1 p.m 50:11,12 68:5,6 77:15,16 78:11 page 3:1,6 10:3 13:8 22:1,4 37:12 50:14,15 50:17,18 55:5 69:18 80:12 81:4 82:11 pages 79:6 81:7 paper 5:9 paragraph 13:7 13:11,18 14:17 16:3,5,6 17:22 18:1 21:19,20 22:15 24:8,13 24:16 25:17 27:9,22 30:22 31:2 34:18,20 36:15 37:10 39:9 42:2,6,6 42:11 46:6,17 46:18 48:19,21 50:20 51:10,15 57:13 58:15,17 63:14,15 64:8 67:2,5 68:16,18 68:19,19 69:4,8 69:9,11,12,14 69:15,17 74:2,2 74:20,21 76:10 76:19 77:3 paragraphs 45:9 part 31:2,5 40:8 41:2,2 42:7,10 44:21,21,22 45:22 57:20	58:10 69:4 particular 11:19 15:5 30:8 44:10 62:8 75:3,13 particularly 12:4 parts 57:21 party 79:12 passage 35:6,18 38:11 patent 1:1,1,6,8 2:12 3:7 6:13 6:14 7:3,3,4,11 9:1,2 12:4 16:7 16:10 17:6,8,11 22:21 32:3,5,15 33:4,11 47:17 49:4 50:5,21 51:1,5,9 52:6 52:10,17 53:3 54:11 55:7,15 55:17,18 56:11 56:14 60:12 62:7,14,17,19 63:1,2,21 patents 7:13 60:19 72:20 pdf 78:6,7 pending 5:20 people 11:9 percent 21:1 perfectly 65:10 68:8 perform 13:19 14:5,9,22 15:16 performed 59:13 performing 15:9 performs 13:12 period 80:13 person 20:5 26:4 26:13 39:19 40:2 47:7 53:16 60:8,15 61:1 pertain 27:8 pertains 25:8 Petitioner 1:4 2:3 physically 12:22 58:21 59:3,4,8
---	--	---	---	--

pictures 12:21 piece 47:22 48:3 49:11,17 place 12:2 18:13 18:16 44:14 45:6 46:10 53:11 62:1 please 4:13,15 5:18 6:4 20:7 28:1 80:6,10,11 80:14 plurality 18:12 21:21 Plus 11:11 point 17:8 19:4 39:5 41:20 60:3 60:19 73:16 points 19:2 39:6 pole 24:18 25:18 25:20 26:3,9,13 53:11,13 57:20 pool 12:10 portable 14:15 portions 28:22 40:13 64:22 POSITA 58:17 position 16:8 18:4 21:16 53:20 64:13 66:15,18 71:22 72:3 possible 14:14 27:18 36:2 37:8 40:10 44:11 47:15 60:4,18 possibly 14:1 potential 37:18 37:22 65:18,19 66:7,7,13,16 prefer 43:19 premise 67:16,17 prepare 9:9 prepared 6:18 10:19,20 preparing 6:21 7:2 62:11 prepping 9:13	present 36:1,17 preserve 6:9 preserving 30:19 pressing 66:8 pretty 36:22 56:9 prevent 18:22 19:4,12 59:6 71:21 72:2,11 prevents 19:2 previous 29:10 32:10 69:3,8 74:19 previously 36:2 prima 77:7 Primarily 47:4 principle 77:5 prior 8:9,19 11:2 11:14,20 14:17 14:22 15:4,12 24:10 48:22 49:2 52:6 57:14 69:12 75:4 76:13,15,21,22 77:4,6 79:9 probably 12:11 14:2 35:2 41:18 43:7 problem 21:2 Procedure 80:14 proceeding 6:15 Proceedings 23:22 42:1 50:12 68:6 77:16 project 11:10,16 proposed 59:20 76:20,22 77:2,4 provide 18:5,7 20:14 39:7 75:19 provided 8:16 17:2 35:12,14 36:11 providing 40:4 ptx 78:6 Public 1:15 79:18 pull 66:22	purchased 80:8 purpose 13:13,19 14:5,10 15:1,9 15:17 76:21 pursuant 1:17 push 74:12 pushing 74:7 put 8:17 48:11 putting 38:17 Q qualified 72:19 question 5:20 6:4 6:6,10 14:7,12 15:11 21:8,13 25:3 30:9,18 32:10,12 39:16 41:12 43:22 44:1 49:14 65:14 72:19 74:19 75:17 questions 5:22 6:8 16:1 44:4 77:10 80:14 81:10,13 quickly 12:21 quite 11:5,12 14:1 R R 4:1 raise 32:9 57:3 raises 56:20 57:5 range 35:11 Rapids 1:15 4:3 re-ask 21:7 reach 37:15 read 16:6 17:16 18:1 22:15,18 24:9 28:1 33:10 34:4 35:5 36:15 37:14 39:15 51:15 67:17 77:18 81:6 reading 10:12 39:18 ready 80:6	realized 7:14 really 14:2 15:4 36:14 42:5 63:16 reason 5:1 26:10 47:6 60:9 recall 6:21 recess 23:21 41:22 50:11 68:5 77:15 recognize 10:1 recollection 48:8 reconvened 23:22 42:1 50:12 68:6 77:16 record 4:13 5:22 6:9 20:7 30:19 68:4,8 79:6 recorded 81:10 81:14 redirect 77:12,17 reduced 58:1 reduces 57:14,19 Reeves 2:4 3:2 4:10 13:17 14:8 14:17 15:8,12 15:22 16:21 18:16 19:6,11 19:17 20:6 21:3 21:9,19 23:14 23:18 26:12,20 27:5,9 28:9 29:5,7 30:3,8 30:22 31:10,16 32:2,14 33:12 33:21 34:2,4,17 37:10 39:1,9 40:9,20 41:4,14 41:20 43:2,12 43:21 45:18 46:7,14 47:2,17 49:16 50:2,7,10 50:18,20 52:9 52:16 53:1,8 54:3,11,18 55:2 55:6,15 56:10	56:13,19 57:5 57:22 58:10,15 59:8,22 60:4,14 60:22 61:7,17 62:5,21 63:16 64:2,8 65:4,10 66:6,16 67:2 68:2 69:10 70:8 70:14 71:5,12 72:1,8 73:3,8 73:19 74:20 75:12,18 76:5 77:10,14,20 78:2,8 refer 6:13 45:10 46:8 55:10 71:9 reference 7:19 54:10 55:13 76:20 referenced 80:6 references 7:13 75:9,10,21 76:3 76:3 77:5,7 referring 23:8,12 46:5 49:2 57:13 69:8,12 refers 16:14 17:12 47:16 48:15 49:4 Reffeor 1:13 4:5 4:11,14 79:7 80:1,4 81:5 82:9 regarding 9:7 regardless 73:16 related 12:7 relative 79:11 relevance 26:18 52:22 relevant 12:4,12 12:12 41:13 52:21 54:12 76:14 remains 22:19 23:1 remember 8:5,21 12:16 19:11
--	---	---	---	---

26:22 48:4 Remind 53:8 removed 41:5 render 76:20 77:7 repeat 29:4 32:11 34:1 49:14 rephrase 30:7 32:11,11 62:13 71:10 reporter 1:14 5:22 78:3,5,9 represented 5:4 representing 5:8 required 14:16 31:11 41:2 requires 32:3 40:3 resist 21:4,10 resolve 29:15 respect 55:8 response 5:15 rest 45:15 restate 14:7 15:11 75:17 restrict 23:7 restricted 23:6 restriction 23:4 restricts 23:5 resulting 75:10 76:4 retractable 18:12 18:17,18,22 19:7,12,18,20 21:21 48:5,6 56:15 retractor 11:21 review 7:2,19,19 8:9 16:12,22 45:22 52:6 80:8 reviewed 7:3 8:5 8:6,13 9:10 10:6,16 reviewing 9:12 72:20 right 4:21 5:4,15 6:18,19 9:7	10:1,7,14 12:14 12:15 13:13 16:5,22 19:8,18 19:22 20:10 21:5,21 22:2,5 22:6,12,13 24:15 25:21 26:1,5 27:4,10 27:15 31:6,16 32:3,7,16 33:15 34:21 35:3,19 36:19 37:1 38:2 38:9 39:3,10,21 40:16 42:12,16 42:19 43:8 45:12 46:15,19 47:3,12 48:18 50:8,21 51:10 52:3,11 55:8 56:1,4,21 57:6 58:12,21 59:9 59:17 60:1,4,9 63:18 64:2,22 65:6,15 66:3,9 67:10 68:14 70:2,5,6,11 72:13 73:11,21 74:16,22 75:14 77:22 rigid 20:13 21:16 22:19 23:1 28:4 41:15,15 64:17 65:6,10 66:18 rigidity 66:1 rod 18:3,6 21:3 21:10 rods 21:15 46:19 47:11 57:10 58:3 69:20 70:9 70:10,19,22 71:16 72:12 74:16 roof 16:15 56:20 57:11 58:2,4 rotate 19:20,21 20:17 rotation 19:1,3,5	19:12 20:4,12 20:15 21:4,10 21:17 rotational 23:9 23:13 roughly 9:13 10:21 27:4 Rousselle 7:3 24:5,16,19,22 25:2,9,20 26:3 26:21 27:10,12 27:17 28:11 29:3 30:1,16 31:11 33:12,22 34:12 35:2,18 37:17 38:1,5,11 39:11 40:1,19 40:20 41:1,16 58:19 59:20 60:7,16 61:3,6 61:10,11,15,16 61:17 63:7,13 63:17,21 65:16 65:17 66:4,6 67:9,19 Rousselle's 27:15 30:3,13 31:3 33:13 34:12,21 39:20 40:14 41:4 64:10,22 route 7:16 rules 5:17 80:14 S S 1:13,14 4:1,5 79:7,17 80:1,4 81:5 82:9 saying 19:11 29:12 36:8 38:19,20 46:10 48:13 52:20 57:18 61:7,15 65:17 71:3,3 says 24:16 28:17 31:20 35:22 36:6,13 37:2 51:1 52:14	54:21 62:14,15 67:18 68:13 Schmeiser 2:14 80:1 school 11:11 Schultz 1:14 79:17 scissor 11:8 20:10 42:15 45:3 64:12 scissoring 18:11 18:19 42:14 44:8,14,17,18 45:1,5,6 49:9 55:22 56:3,21 57:6 58:1,10,18 59:14 64:16,18 65:4 70:5 scissors 12:9 scope 15:2 16:11 28:7 40:18 43:16,16 51:16 52:4,13,18 53:5 54:14,19 55:3 60:12 61:5 76:12 scrolling 12:21 Seattle 2:7 sec 28:14 second 28:9 32:20 42:13,20 67:3,20 68:7 secondary 42:13 45:1,8 section 34:16 39:1,2,17 42:13 54:12 sections 77:8 see 12:9 14:20 22:8 24:3 25:18 32:21 38:5 39:11 41:12 44:5 47:8,22 48:22 51:3 58:17,19 64:13 67:6 69:1,21 74:8 76:5	seen 5:12 9:4 29:14 segment 34:6 selected 36:5 80:10 semi 20:13 32:22 sense 68:2 sentence 18:1 34:4,10 36:13 36:16 37:11,14 38:4,5,8 51:15 58:16 67:17,18 67:21 69:10 sentences 35:6 served 13:4 set 79:14 sexist 41:18 Shade 1:3 80:3 81:4 82:8 Shanghai 1:6 80:3 81:4 82:8 shape 36:21 37:7 63:6 shapes 34:7 sheet 80:11 81:11 82:6 shell 66:9 shelter 24:20 25:2 26:21 51:21 shelter/tent 24:17 36:17 short 50:10 shortcomings 52:15 Shorthand 1:14 show 15:20 25:15 32:20,21 37:9 54:13 shown 22:20 35:12,14 38:8 42:16,18 49:6 51:20 75:7 shows 25:5,6 27:15 31:21 32:19 43:11 48:17 49:8
--	--	--	--	--

63:21 sic 28:19 side 16:15 18:14 18:14 22:12 36:18 54:22 sides 28:22 35:15 42:14 sign 77:18 80:7,8 signature 10:3 80:6,12 81:4,17 82:22 signed 10:7 80:11 signing 80:10 similar 52:10 simply 69:19 Sincerely 80:18 single 19:4 26:4 26:13 31:20 61:22 site 35:1 38:1 sites 54:11 sitting 17:16 43:12 61:1 73:19 situation 70:4,11 70:17,22 71:12 72:2 sized 11:8 skill 39:19 40:2 47:7 53:16 60:8 60:15 61:2 76:13,17 skip 16:5 27:22 slider 51:20 52:2 slightly 62:13 solely 16:4 solution 57:14 72:7,7 solutions 48:22 49:2 somebody 62:1 sorry 22:18 24:13,14 41:19 69:10,14 70:9 sort 8:14 11:13 46:1 74:21 sorts 44:19	sound 56:1 67:16 sounds 27:4 space 14:20 15:6 15:14 24:12 36:20 57:15,19 58:1,3,7 span 20:13 speak 15:4 speaking 6:1 special 45:6 specifically 11:4 16:14 17:10,12 28:17 33:5,9 36:8,10 37:11 39:5 44:21 46:5 49:4 50:14 53:15 54:21 55:11 57:2 61:21 62:14,17 68:13 75:12 specification 47:10 specifies 48:9 speculate 60:18 speculation 14:11 20:1,19 28:8 30:6,18 31:13 33:8,17 34:14 40:18 41:11 43:9,17 50:3 52:5,19 53:6 54:15,20 55:4 57:1,8 58:6 59:19 60:10 61:5,20 66:20 71:2,8,19 72:4,15 spend 9:11 72:17 spent 6:21 72:19 Spoke 9:10 spot 51:17 spring 52:1 66:14 springing 30:2 ss 79:3 stability 16:9 17:9,13 19:5 stands 71:21	started 7:14 starting 33:22 38:11 51:12 state 4:13 22:20 32:20 33:1,9 36:14 64:6,6 79:2 stated 63:14 statement 26:9 64:15,21 69:3 74:10,15 states 1:1 30:1 62:19 63:1 statics 12:5 stay 49:20 Ste 2:6,15 80:2 steel 66:2 stool 59:12 stopped 11:22 store 37:21 stored 66:13,16 straight 48:17 Street 1:21 81:1 82:2 strength 12:6 16:9 structural 16:9 16:15,15,16 21:18 30:11,15 41:6,8 47:22 64:20 66:8 structurally 67:16 structure 14:19 16:8 20:3,3,13 21:2,16 24:11 28:4 36:20 37:19 40:5,8 41:1 42:7,14 49:8 56:20 57:15,19 58:8 58:11 59:5 65:21 67:15,20 68:10 69:20 71:21 structures 11:5,6 11:11 20:14	44:19 54:16 66:5 students 65:22 style 24:17 subject 6:15 submitted 9:2 subsequent 36:6 substantial 36:19 Sue 4:14 sufficient 77:7 suggest 34:10 53:3 63:5,9 suggestion 77:1 Suite 1:21 81:1 82:2 summing 74:21 support 11:8 12:11 17:12 18:5,7,11 20:14 40:8 49:8,10,12 49:17 53:10 55:8 58:8,11 64:11,20 65:15 65:18 67:19 69:20 70:9,10 70:19,22 71:16 74:16 supported 49:20 supporting 16:14 18:5,7 23:4,5 46:19,22 47:2,5 47:6 57:10 58:3 72:12 supports 16:15 16:16 21:18 22:19 54:22 67:9 supposed 7:17 44:3 sure 9:20 10:4 21:9 22:7 26:12 27:3 28:10 32:14 34:6 42:20 52:16 62:21 71:12 73:19 77:14,20 swing 11:9	sworn 4:6 79:10 T take 5:18,19 7:1 17:22 23:18 24:8 29:2 30:22 33:21 35:5 38:4 39:14 41:21 47:17 49:5 50:10,13 51:12 58:15 68:2 69:17 73:1 77:12 taken 1:13 23:21 34:15 41:22 50:11 68:5 77:15 talk 9:17 13:6 46:17 48:21 66:1 talking 21:20 39:1,5 52:7 55:21 70:1 74:3 taught 61:16 teach 11:11 12:5 31:18 44:20 62:5 63:8,17 teaches 31:17 40:1,19,20 41:1 41:13,17 59:21 61:6,11 68:20 74:6 76:22 teaching 11:16 12:5 61:9 62:10 62:13 63:2,4 64:2,5,5,6 teachings 77:6 tell 51:17 56:7,14 62:17 79:10 template 8:17 ten 9:13 77:12 tent 8:8 24:20 25:2 26:21 28:2 49:20 59:5 tents 29:14 testified 4:7 testify 5:14 60:13
--	---	--	--	---

testifying 4:20	today 4:20 5:2,4	turn 13:7 23:4	units 18:12,17,18	want 10:4 13:6
testimony 5:2	5:17 6:13 9:9	twice 9:16	18:19,22 19:7	14:2 24:4 27:22
8:10,13,19,21	9:18 43:13 61:1	two 19:2,21 20:3	19:12,18,21	37:10 40:9
13:16 15:19	top 19:2,4 69:17	20:13 23:6 35:6	20:17 21:5,10	41:21 42:2,12
18:9,21 19:16	Total 9:13	35:10 43:11	21:21 22:9,12	44:11 46:17
23:11 24:2	TRADEMARK	44:12 54:16	56:15 57:6 70:8	48:18 59:10,11
26:16 27:2 31:9	1:1	55:12 63:22	University 2:15	63:16 67:2 68:7
42:4 46:21 59:2	transcript 79:5	66:3	80:2	68:16,18,18
61:14 65:8	80:6,7 81:7	two-thirds 68:20	unsatisfactory	74:20
66:12 70:7 73:7	transcription	type 28:4	76:21	wanted 23:18
73:13 74:19	81:10,12	typos 10:11	unsuitable 15:6,8	39:19 40:13
75:6,16 76:1	translational		15:14	Washington 1:21
79:7	23:9,13	U	upper 52:1	2:7 81:2 82:3
Thank 29:6 34:3	TRIAL 1:1	U.S 6:14 50:20	upward 74:7	wasn't 7:16 12:20
50:19 78:2,9	true 8:2 20:2	51:5	usable 14:18,20	52:20 60:13
theoretically	56:10 63:14	Um-hmm 13:14	15:13 24:10,12	watching 17:16
48:9	65:9 66:5 67:22	35:4 69:22	36:20	Watts 2:14 80:1
therapeutic	76:2 77:22 79:6	umbrella 24:17	use 29:14 30:3,13	way 17:13 24:14
12:10	81:9,11	28:2	34:10 39:7 43:3	26:4 29:16
thing 23:16 44:21	truly 20:14	undergoing 59:6	50:2 52:17 53:2	30:13 31:2 37:7
68:7 74:13	truth 79:10	understand 4:20	53:4 59:12	43:10 48:9
things 7:7 8:5	truthful 5:2	6:4,14 16:13	user 32:6,15 33:6	49:20 53:17,21
12:2 14:5,9	try 6:1	30:9 33:4 44:7	uses 53:3,10	54:3,8,17 56:8
35:1 46:2 62:4	trying 44:7 45:18	44:11 45:18		61:10,11,16,18
think 9:20 10:3	48:4 53:1	52:21 53:1	V	62:8 63:6 68:20
13:8 14:1 19:10	Tsai 7:3 15:5,5	62:21 65:22	v 80:3 81:4 82:8	73:17,17,20
26:20 35:1	15:13 16:1 24:6	68:9 72:8	vague 14:6	74:1
45:10 46:7 52:9	43:3,6 44:7,9	understanding	varied 34:7	ways 60:18 62:9
52:21 55:20,21	44:17,22 45:7	43:2 45:15	various 34:6	62:18 63:3
55:22 63:4 68:8	45:12,20 46:1,9	72:18 76:11,19	view 13:21 14:4	WEDNESDAY
73:2,15	46:11 47:10	77:3	16:17 21:3,9	4:2
thinking 21:14	50:7,13 51:9	understood 6:6	29:20 44:7	weeds 7:14,15
30:20	52:9,9 53:4,13	72:21	45:19 61:10	week 77:21
third 20:15	54:11,21 55:6	undo 59:16	63:7,17 70:4,18	weight 49:22
thoroughly 73:14	55:10,11,13,17	unflex 70:5,10	71:5 72:9	64:11 67:5,8,12
thought 45:20	55:20 56:19	unflexing 69:20	visible 55:12	Welcome 24:1
49:14 73:9	58:2,18 60:6	unfold 26:4,13	visual 20:5	Wendy 1:13 4:5
three 23:12,13	68:9,13,20	32:6,15 33:3,6	volume 14:18	4:14 79:7 80:1
63:22	72:10 73:9 74:3	33:9	24:10	80:4 81:5 82:9
time 5:18 6:8,9	Tsai's 15:21 42:7	unfolded 16:8	vs 1:5	went 8:7
6:21 8:11 9:13	42:10 44:13	22:20 32:18		whatsoever
10:21 23:19	45:15 46:14,18	33:5 64:13 74:4	W	64:20
41:16,21 43:18	47:3 48:21 50:5	Unfortunately	wait 28:14,14,14	wheel 62:2
47:14 49:15	57:9 70:2,18	20:6	28:14,15,15	whereof 79:14
61:21 72:17,20	71:13 72:6,7	unibody 28:4	32:20 42:20	With-U 1:6 80:3
73:1 77:20 78:2	tube 35:8	unit 48:5,6	waive 80:9	81:4 82:8
80:13	tubes 31:6 67:20	UNITED 1:1	walking 40:7	withdraw 38:15

withstanding 40:15	33:9 42:18 43:1 43:3 46:4,8	53:2,4,7,9 54:12 55:7,11	25 10:3 2500 2:6	39:9 52:1 480 2:17
witness 4:6 13:4 14:13 21:14 23:20 30:20 33:19 37:4,6 54:7 79:10,14 80:8 81:5,17 82:9	57:9 59:7,13,17 75:3,13 1(A) 25:12,14 38:12,21 1(B) 25:14 38:12 38:21 1(C) 25:14 38:9 38:12,21 39:3,5	17 5:9 49:4,7,8 51:3 52:11 53:2 53:4,7,9 54:13 55:7,11,20 56:1 56:19 57:14,22 68:9 69:13 1730 1:21 81:1 82:2 18 2:15 76:10 80:2 18(A) 25:15 180 35:11,11,19 19 32:19,20,21 1C 18:12 1D 22:18	25th 79:15 26 50:14 28 36:16 3 3 29:2,5 46:19 57:11 58:4 69:20 70:9,10 70:19,22 71:16 72:12 74:16 30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15 4 4 3:2 17:10 32:18 35:2 4(B) 27:12 4,607,656 3:7 50:21 51:6 40 24:8,13,16 25:17 37:21 38:1 405-2000 2:8 41 27:9 43 17:10 45 27:22 35:16 46 30:22 31:2 47 34:18 48 17:14 37:10	49 28:19 49404 4:17 5 5 17:15,15 37:22 39:11 50 28:19 51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14 6 6 23:7,12 28:19 51:20 61 68:16,18 62 68:19,19 63 69:17 64 74:2,2 655-0073 2:17 656 51:1 52:16 54:11 55:7,15 55:17,18 66 74:20 68 79:6 7 7 17:15,15 70 51:22 72 52:1 738 6:13 7:4,10 12:4 16:7,10 17:6,8 22:21 27:8 32:2,5,15 47:17 56:11,14 74 52:1
words 63:4	10 13:8 17:15 36:10 10-5-2025 79:21 10,669,738 1:6 6:15	1730 1:21 81:1 82:2 18 2:15 76:10 80:2 18(A) 25:15 180 35:11,11,19 19 32:19,20,21 1C 18:12 1D 22:18	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
work 11:10,16 13:21 14:2 43:7 43:13,14 49:22 59:9,16 60:20	10 13:8 17:15 36:10 10-5-2025 79:21 10,669,738 1:6 6:15	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
worked 11:20	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
worry 39:17	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
wouldn't 19:4 53:3 59:9,16	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
writing 13:21	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
written 44:6 75:7 75:7 80:22	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
wrong 24:14	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
wrote 47:14	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0646 82:4 2024 1:16 4:2 79:8,15 80:4,20 81:5 82:10 206 2:8 21 22:6,12 32:21 37:22 39:11 23 76:19 232-0646 1:22 81:2 24 4:2 69:18 77:3 79:8 80:4 81:5 82:10 24th 1:16	30 55:5 310 31:6 35:8 59:6 67:20 312 35:9 32 13:7,11,18 16:3 55:5 320 35:8 37:17,20 38:6 39:2 33 14:17 35:2 330 35:10 34 37:20 38:1,11 340 35:10 343B 35:15 35 16:5,6 29:2,5 37 17:10,22 29:2 29:5 38 21:20,20 39 22:15	51 3:7 42:2,6,11 45:9 52 45:9 5262 4:16 53 45:10 46:17,18 54 45:10 55 48:19,21 57:13 69:14,15 57 58:15 63:15 58 51:13,19,20 52:2 63:14,15 64:8 59 67:2,5 69:14 69:14
X	10:41 41:22 10:48 42:1 100 21:1 1001 17:6 1003 24:5 1005 24:6 101 2:15 80:2 11 1:15 35:2 36:16 37:20 38:1	2 22:21 46:5,8 50:14,17,18 51:12,19 55:5 2(A) 27:17,19 20 7:1 32:19,19 42:16 43:4 20036 1:21 81:2 82:3 2007 9:21 202 1:22 81:2 202)-232-0646 80:15 202)232-0		

76 52:2				
8				
8 17:15 48:1,6 56:15				
8(A) 35:15				
8(D) 35:13				
8:59 1:17 4:4				
812 1:21 81:1 82:2				
85201 2:16 80:2				
9				
9:49 23:21				
9:56 23:22				
90 35:13,13,16,19 36:1,7,8,10 37:15				
925 2:6				
98104 2:7				