

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG
ELECTRONICS AMERICA, INC.,

Petitioner,

v.

APEX BEAM TECHNOLOGIES LLC,

Patent Owner.

Case IPR2023-00599

Patent No. 10,912,081

DEPOSITION OF MIGUEL GOMEZ

DATE: MARCH 12, 2024

REPORTED STENOGRAPHICALLY BY: JENNIFER MILLER,

RMR, CRR, CCR-NJ, CCR-NM, CCR-WA

Notary Public

Patent No. 10,912,081

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Samsung Exhibit 1024, Page 1 of 42
Samsung v. Apex - IPR2023-00599

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2
3 TRANSCRIPT of the witness, called for
4 Oral Examination in the above-captioned matter,
5 taken by and before JENNIFER MILLER, a Notary
6 Public, and a Registered Merit Reporter,
7 Certified Realtime Reporter and Certified Court
8 Reporter of the State of New Jersey, at
9 FABRICANT, LLP, 51 John F. Kennedy Parkway, 7
10 First Floor West, Short Hills, New Jersey, on
11 March 12 2024, commencing at approximately
12 10:00 in the
13 morning.

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1 A P P E A R A N C E S:

2

3

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I N D E X

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(NO EXHIBITS MARKED.)

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

2 MIGUEL GOMEZ, after
3 having been first duly sworn, was
4 examined and testified as follows:

5 - - -

6 E X A M I N A T I O N

7 - - -

8 BY ATTORNEY GOLDBERG:

9 Q. Good morning, Mr. Gomez.

10 Can you please state your full
11 name and address for the record?

12 A. Yes. Miguel Willie Gomez, 2178 Sirah
13 Court, Livermore, California 94550.

14 Q. And you understand that you're under
15 oath this morning?

16 A. Yes.

17 Q. And that this means you are sworn to
18 tell the truth as if you were in court with a
19 judge and a jury?

20 A. Yes.

21 Q. Is there anything that will prevent
22 you from giving full and truthful answers
23 today?

24 A. No.

25 Q. You've been deposed before, right?

1 **A. Yes.**

2 Q. About how many times?

3 **A. 15 or 16 times so far.**

4 Q. Okay. So you know the drill.

5 There may be times today that I
6 do not ask a clear question. If you don't
7 understand any of my questions, please ask me
8 to clarify. Okay?

9 **A. I will.**

10 Q. Is it fair for me to assume that if I
11 ask you a question and you answer it, that you
12 understood what I asked you?

13 **A. Yes.**

14 Q. We'll try to take breaks every so
15 often. Before we take a break today, I'd like
16 you to complete the answer to any question
17 that's pending.

18 Is that fair?

19 **A. That's fair.**

20 Q. And also please let me know if you
21 need a break. Again, I just ask that you
22 complete your answer to any question that's
23 pending before the break.

24 And during any break, do you
25 understand that you may not discuss the

1 substance of your testimony with Apex Beam's
2 counsel or anyone else?

3 **A. I do.**

4 Q. I'm handing what's been previously
5 marked as Exhibit 1004.

6 Do you recognize this document?

7 **A. I do.**

8 Q. What is it?

9 **A. It's the Kim patent -- international**
10 **patent number -- this is the Kim international**
11 **patent.**

12 Q. I'd like to direct your attention
13 to --

14 **A. I'm sorry. Lee. I get that**
15 **confused.**

16 Q. Okay. Just so the record is clear
17 and we're all on the same page, this is the Lee
18 reference?

19 **A. This is the Lee reference, correct.**

20 Q. Thank you.

21 Now let's turn to Figure 12 on
22 page 87.

23 Do you see on this figure the TB
24 1201 and TB 1202?

25 **A. I do.**

1 Q. Are Lee's TB 1201 and TB 1202 the
2 same or different radio signals?

3 A. **It's my understanding from reading**
4 **the patent that these are different radio**
5 **signals.**

6 Q. Would different places on the time
7 frequency resources and using different beams
8 make two TBs different radio signals?

9 A. **It can, definitely.**

10 Q. It can or it would?

11 ATTORNEY PYMENTO: Objection to
12 form.

13 THE WITNESS: Well, it -- it
14 certainly would and -- it certainly would.
15 And it depends on how the -- the data was
16 constructed, whether it came from the same
17 bit block or not.

18 BY ATTORNEY GOLDBERG:

19 Q. Handing you what's been previously
20 marked as Exhibit 2004.

21 Do you recognize this document?

22 A. **I do.**

23 Q. And what is it?

24 A. **This is my declaration for this**
25 **matter.**

1 Q. Let's look at page 34.

2 Is that your signature on
3 page 34?

4 A. Yes, it is.

5 Q. And did you draft this declaration?

6 A. I drafted it in conjunction with the
7 counsel at Fabricant.

8 Q. What do you mean by you drafted it in
9 conjunction with the counsel at Fabricant?

10 ATTORNEY PYMENTO: Objection.

11 And also instruct the witness
12 not to answer to the extent that it
13 includes privileged information.

14 THE WITNESS: So counsel and I
15 discussed the concepts of the various
16 patents, including the patent at issue,
17 the '081; and the prior art that was
18 asserted against it.

19 And we discussed the issues with
20 the assertions and formulated a response.

21 BY ATTORNEY GOLDBERG:

22 Q. And who wrote the declaration?

23 A. I wrote some sections of it. They
24 wrote other sections; I don't recall exactly
25 which ones.

1 **But it was collaborative effort.**

2 Q. Did you carefully review the
3 declaration and make sure that you agree with
4 everything in it before you signed?

5 A. Yes, I did. These are my opinions in
6 this declaration.

7 Q. About how long did you spend
8 preparing the declaration?

9 A. I don't precisely recall. But it
10 was, you know, a considerable amount of time.

11 Q. More than 100 hours?

12 A. No.

13 Q. More than 50 hours?

14 A. You know, there were several
15 declarations that we were working on at the
16 same time.

17 I think, previously, when I
18 talked about my time, I may have confused some
19 of the -- mixed many of them together. But I
20 don't recall specifically how much time I spent
21 on this particular one.

22 Q. Do you recall whether it was more
23 than ten hours?

24 A. Definitely more than ten hours.

25 Q. More than 20?

1 **A. Maybe thereabouts. I don't recall**
2 **precisely.**

3 Q. And how long did you spend preparing
4 for your deposition today?

5 **A. Well, counsel and I met yesterday,**
6 **and I started preparing over the weekend as**
7 **well as yesterday for both -- both declarations**
8 **that will -- or both depositions that will be**
9 **happening this week.**

10 Q. So that's Saturday, Sunday, and
11 Monday?

12 **A. Yes. Saturday, I prepared. Sunday,**
13 **I flew out here.**

14 Thought I could prepare on the
15 **airplane, but I couldn't. And then prepared**
16 **yesterday. So perhaps just two days.**

17 Q. Your declaration -- and I'll draw
18 your attention to paragraph 27.

19 You propose construing "radio
20 signal" to mean [as read]:

21 "a signal that transmits
22 particular radio information."

23 **A. Paragraph 27, you said, right?**

24 Q. Yes.

25 Now that you're there, you

1 proposed construing "radio signal" as

2 [as read]:

3 "a signal that transmits
4 particular radio information."

5 Right?

6 **A. That's correct.**

7 Q. What do you mean by "particular radio
8 information"?

9 **A. Well, it depends on the content.**

10 **If the content is changing, the**
11 **information itself is changing. Then it's a**
12 **different radio signal.**

13 Q. You'd agree that "particular radio
14 information" can include multiple pieces of
15 radio information, right?

16 **A. Well, then you're redefining the word**
17 **"information."**

18 **The -- radio information is a**
19 **consistent and a one type of one transmission.**
20 **So it's a signal that transmits a particular**
21 **radio information. So it would be the content**
22 **of that radio information.**

23 Q. Is downlink control information
24 particular radio information?

25 **A. It can be, yes.**

1 Q. What is downlink control information?

2 A. Downlink control information is the
3 information that defines the radio resources as
4 well as the modulation types that will be
5 utilized.

6 Q. Downlink control information is
7 commonly abbreviated "DCI"; is that right?

8 A. That's the way I --

9 ATTORNEY PYMENTO: Objection to
10 form.

11 THE WITNESS: I see it as DCI as
12 well.

13 BY ATTORNEY GOLDBERG:

14 Q. Does DCI include research allocation
15 information?

16 ATTORNEY PYMENTO: Objection.

17 THE WITNESS: I think I just
18 said that it does include resource
19 allocation information.

20 - - -

21 (Stenographer clarification.)

22 - - -

23 BY ATTORNEY GOLDBERG:

24 Q. And does DCI include beam ID
25 information?

1 ATTORNEY PYMENTO: Objection.

2 Form.

3 THE WITNESS: I don't believe it
4 does. I'd have to go back and look at
5 that. I haven't memorized the entire
6 specification.

7 BY ATTORNEY GOLDBERG:

8 Q. Does DCI include scheduling
9 information?

10 ATTORNEY PYMENTO: Objection.

11 Form.

12 THE WITNESS: It determines
13 where the resources will be located.

14 BY ATTORNEY GOLDBERG:

15 Q. So DCI does include scheduling
16 information?

17 ATTORNEY PYMENTO: Objection.

18 Form.

19 THE WITNESS: It certainly would
20 include where the resources are allocated
21 to, yes.

22 BY ATTORNEY GOLDBERG:

23 Q. Does DCI include antenna
24 configuration information?

25 ATTORNEY PYMENTO: Objection.

1 Form.

2 THE WITNESS: It certainly
3 includes modulation types.

4 I don't believe it includes
5 antenna information, but I'd have to go
6 back and look at that.

7 BY ATTORNEY GOLDBERG:

8 Q. Does DCI include candidate scheme
9 information?

10 ATTORNEY PYMENTO: Objection to
11 form.

12 THE WITNESS: I don't believe it
13 does, but I'd have to go back and look.

14 BY ATTORNEY GOLDBERG:

15 Q. Does DCI include beam-switching
16 information?

17 ATTORNEY PYMENTO: Objection.
18 Form.

19 THE WITNESS: Again, it's -- I
20 haven't memorized the entire
21 specification. I'd have to go back and
22 look.

23 But my understanding of DCI,
24 from what I've -- how I've used it is that
25 it's -- it includes resource information

1 and modulation information.

2 BY ATTORNEY GOLDBERG:

3 Q. And, Mr. Gomez, I'm handing you
4 what's been previously marked as Exhibit 1001.

5 Do you recognize this document?

6 **A. This is the '081 patent.**

7 Q. Let's turn to Figure 5.

8 How many radio signals are shown
9 in Figure 5?

10 **A. Well, there's a first radio signal
11 and a second radio signal in Figure 5.**

12 **And this also shows transmitting
13 and receiving. It's the first and second radio
14 signals.**

15 Q. So there's two radio signals in
16 Figure 5?

17 **A. That's what the diagram says.**

18 Q. Let's turn to Figure 7 of the
19 '081 patent.

20 Figure 7 shows a first radio
21 signal with consecutive symbols in the time
22 domain, right?

23 **A. It shows a first radio signal
24 consecutive -- consecutive of times and then a
25 first time point.**

1 Q. Okay. So just to clarify the record.

2 You agree that it shows a first
3 radio signal with consecutive symbols in the
4 time domain, right?

5 A. Yes, it does.

6 Q. And there are no time gaps between
7 the consecutive symbols, right?

8 A. Well, there's the "dot, dot, dots,"
9 which means it's a continuation.

10 Q. So the "dot, dot, dots" represent
11 other symbols?

12 A. Yes.

13 Q. So factoring in those other symbols,
14 what we're seeing in Figure 7 is a first radio
15 signal with a bunch of consecutive symbols that
16 do not have gaps between them?

17 ATTORNEY PYMENTO: Objection.

18 Form.

19 THE WITNESS: Well, this is a
20 diagram in one of the embodiments.

21 There's nothing in the patent -- I'd have
22 to go back and look for it.

23 But I don't think there's
24 anything in the patent that limits it to
25 just that embodiment.

1 BY ATTORNEY GOLDBERG:

2 Q. Well, setting aside that there may be
3 other embodiments disclosed in the '081 patent,
4 do you agree that the embodiment shown in
5 Figure 7 depicts a first radio signal having a
6 series of consecutive symbols in the time
7 domain?

8 A. What it shows is that there's a set
9 of consecutive symbols that are collectively
10 known as the first radio signal in a first time
11 unit.

12 Q. Each symbol occupies a specific
13 length of time, right?

14 A. Symbols do have specific lengths of
15 time, correct.

16 Q. If you know the start time of the
17 first symbol in the radio signal, you would
18 also know the start time of the second symbol
19 in the first radio signal, right?

20 ATTORNEY PYMENTO: Objection to
21 form.

22 THE WITNESS: Again, we're just
23 talking about this one embodiment in
24 Figure 7 and ignoring other possible
25 embodiments, as you mentioned.

1 So there would be -- taking that
2 narrow approach, in this particular
3 diagram, you've got a first symbol
4 followed by a second one. And we have
5 several dots and then additional symbols
6 and then more dots.

7 So, you know, whatever happens
8 in between those dots is -- could be,
9 again, defined in a different embodiment.

10 BY ATTORNEY GOLDBERG:

11 Q. Well, let's just focus on the first
12 symbol and the second symbol and the first
13 radio signal depicted in Figure 7.

14 A. Uh-hum.

15 Q. If you know the start time of the
16 first symbol, you would also know the start
17 time of the second symbol, right?

18 ATTORNEY PYMENTO: Objection.
19 Form.

20 THE WITNESS: You'd have to have
21 additional information, such as which
22 numerology we're using that's being
23 considered that would change the times.
24 But, generally, the first symbol -- the
25 second symbol follows the first symbol.

1 BY ATTORNEY GOLDBERG:

2 Q. What do you mean by "numerology"?

3 A. Well, the symbol times are different
4 for different numerologies.

5 Q. Within a given numerology, are the
6 symbol times always the same?

7 ATTORNEY PYMENTO: Objection.
8 Form.

9 THE WITNESS: So within a given
10 numerology and, of course, ignoring any
11 other embodiments, they would be the same.

12 BY ATTORNEY GOLDBERG:

13 Q. So within a given numerology, if you
14 know the start time of the first symbol -- of
15 the first radio signal depicted in Figure 7,
16 you would also know the start time of the
17 second symbol of the first radio signal
18 depicted in Figure 7, right?

19 ATTORNEY PYMENTO: Objection.
20 Form.

21 THE WITNESS: I'm sorry. One
22 more time on the question, please.

23 ATTORNEY GOLDBERG: I'll ask the
24 Court Reporter to read back the question.

25 - - -

1 (Whereupon, the record was read
2 as follows:

3 "QUESTION: So within a given
4 numerology, if you know the start
5 time of the first symbol -- of the
6 first radio signal depicted in
7 Figure 7, you would also know the
8 start time of the second symbol of
9 the first radio signal depicted in
10 Figure 7, right?")

11 - - -

12 ATTORNEY PYMENTO: Objection.
13 Form.

14 THE WITNESS: Again, this is
15 just one embodiment where the slots -- or
16 the symbols are consecutive and ignoring
17 any other ones.

18 The second symbol would follow
19 the first symbol, and that would be a
20 known time.

21 BY ATTORNEY GOLDBERG:

22 Q. Do you see the first time point in
23 Figure 7?

24 A. I do.

25 Q. If an entire TB was sent before that

1 first time point, you would know that each
2 symbol in the TB was sent before the first time
3 point, right?

4 ATTORNEY PYMENTO: Objection.
5 Form.

6 THE WITNESS: I don't see a TB
7 on this diagram.

8 BY ATTORNEY GOLDBERG:

9 Q. Do you know what a TB is?

10 A. **You're referring to the other patent**
11 **for the TBs?**

12 Q. We discussed some TBs earlier today.

13 A. **Yes, we did.**

14 **But in this particular diagram,**
15 **we're just looking at the symbols.**

16 Q. Do TBs contain symbols?

17 ATTORNEY PYMENTO: Objection.
18 Form.

19 THE WITNESS: Is this the other
20 patent?

21 What was your question one more
22 time?

23 BY ATTORNEY GOLDBERG:

24 Q. Do TBs contain symbols?

25 ATTORNEY PYMENTO: Objection.

1 THE WITNESS: TBs would contain
2 symbols.

3 BY ATTORNEY GOLDBERG:

4 Q. Looking back at Figure 7 of the
5 '081 patent.

6 If we were to draw an entire TB
7 before the first time point, you would know
8 that each symbol in the TB is sent before that
9 time point, right?

10 ATTORNEY PYMENTO: Objection.
11 Form. Scope.

12 THE WITNESS: Given the
13 limitation in Figure 7 and it's one
14 embodiment and your question about a TB
15 drawn before the first time point, so it
16 would -- you're saying that it would have
17 the hashed marks just like the symbols
18 shown before the first time point?

19 BY ATTORNEY GOLDBERG:

20 Q. Is that how you would draw an entire
21 TB before the first time point?

22 ATTORNEY PYMENTO: Objection.
23 Form. Scope.

24 THE WITNESS: Well, to be
25 consistent with Figure 7, if you go up to

1 the middle block, it says "multicarrier
2 symbol" and "first radio signal" before
3 the first time point.

4 But the way you asked the
5 question, it seems like what you're saying
6 is that the TB would be hashed in the same
7 way as the multicarrier symbol and the
8 first radio signal before the first time
9 point.

10 BY ATTORNEY GOLDBERG:

11 Q. Okay. With that understanding, for
12 that entire TB being before the first time
13 point, you would know that each symbol in the
14 TB is sent before the first time point, right?

15 ATTORNEY PYMENTO: Objection.
16 Form. Scope.

17 THE WITNESS: Then there would
18 be no symbols in the TB that would be
19 hashed, according to the box that says
20 "multicarrier symbol" and the first radio
21 signal behind the first time point.

22 BY ATTORNEY GOLDBERG:

23 Q. Thank you.

24 Now let's talk about slightly
25 different scenario.

1 If an entire TB is sent after
2 the first time point, you would know that each
3 symbol in the TB is sent after the first time
4 point, right?

5 ATTORNEY PYMENTO: Objection.
6 Form.

7 THE WITNESS: These
8 hypotheticals get away from the teachings
9 of the patents, which is that there is a
10 first time point.

11 If you have it before or after,
12 there's no point of the first time point.

13 I think the important thing is
14 that, sure, it's behind the first time
15 point, but there -- what's the point of
16 the first time point? It doesn't need to
17 be there, then.

18 And that's the whole inventive
19 quality of the '081 patent.

20 BY ATTORNEY GOLDBERG:

21 Q. Okay. But can you answer my
22 question?

23 If an entire TB is sent after
24 the time point, you would know that each symbol
25 in the TB is sent after that time point, right?

1 ATTORNEY PYMENTO: Objection.

2 Form. Scope.

3 THE WITNESS: Again, ignoring
4 the inventive quality of the '081 patent,
5 if you send them after the first time
6 point, there's no need for the first time
7 point. It probably wouldn't even exist.

8 It's just that you wouldn't need
9 that definition at all, but you could.

10 BY ATTORNEY GOLDBERG:

11 Q. Let's try this again.

12 I'm not asking about what the
13 inventive quality is or isn't about the
14 '081 patent.

15 I'm just asking, if an entire TB
16 is sent after the first time point, you would
17 know that each symbol in the TB is sent after
18 that time point, right?

19 ATTORNEY PYMENTO: Objection.
20 Form. Scope. Asked and answered.

21 THE WITNESS: The first time
22 point is defined by the '081 patent. So
23 it's hard to ignore it as being integral
24 to the '081 patent.

25 If the scheduling resources were

1 such that the TB was placed in a
2 particular resource area, you can say that
3 that would be the first time point. The
4 beginning of that would be the first time
5 point, but that's putting the horse -- the
6 cart before the horse. It's backwards.

7 The only reason you would point
8 to the first time point is because that's
9 the beginning of the TB.

10 BY ATTORNEY GOLDBERG:

11 Q. Let's talk about time point instead
12 of first time point.

13 If an entire TB is sent after a
14 time point, you would know that each symbol in
15 the TB is sent after that time point, right?

16 ATTORNEY PYMENTO: Objection.
17 Form. Scope.

18 THE WITNESS: So time point
19 isn't -- so time point is not a term used
20 by the '081 patent. So it kind of doesn't
21 have any meaning, unless you're referring
22 to the first time point.

23 BY ATTORNEY GOLDBERG:

24 Q. Do you know what the word "time"
25 means?

1 A. **"Time"?**

2 Q. Yes.

3 A. **Well, that's -- in terms of the**
4 **patent or in terms of in general?**

5 Q. Either.

6 ATTORNEY PYMENTO: Objection.

7 THE WITNESS: Time is a -- is a
8 measurable event or measurable quantity.

9 It's a -- a passage of occurrences.

10 BY ATTORNEY GOLDBERG:

11 Q. Do you know what a time point is?

12 A. **A time point would be one of those**
13 **occurrences or a point in time.**

14 Q. So using that definition, if an
15 entire TB is sent after a time point, you would
16 know that each symbol in the TB is sent after
17 that time point, right?

18 ATTORNEY PYMENTO: Objection.

19 Form. Scope.

20 THE WITNESS: So when you're
21 scheduling resources, you're selecting the
22 resources and applying the symbols to --
23 the contents of the symbols to that --
24 those resources.

25 There's -- there isn't a time

1 point other than a set of resources that
2 you're referring to. So saying that we
3 have a time point is just pointing to the
4 beginning of the resources in your -- in
5 your question.

6 BY ATTORNEY GOLDBERG:

7 Q. Okay. Earlier you mentioned the
8 concept of numerology.

9 Is that a concept in 5G?

10 **A. Different --**

11 ATTORNEY PYMENTO: Objection.
12 Form.

13 THE WITNESS: 5G has different
14 numerologies.

15 BY ATTORNEY GOLDBERG:

16 Q. Is this -- is the '081 patent
17 directed to 5G technology?

18 **A. I think the '081 patent is trying to**
19 **solve the problem that 5G as well as other --**
20 **other transmission -- related transmission**
21 **protocols have.**

22 **And that's the amount of control**
23 **information required in order to schedule**
24 **different radio frequencies and radio**
25 **transmission mechanisms.**

1 Q. Can you turn to column 1 of the
2 '081 patent?

3 Do you see the reference on
4 line 32 to "3GPP New Radio"?

5 A. You said column 1, 32?

6 Q. Yeah, column 1 --

7 A. Of the '081 patent?

8 Q. Oh, sorry. Line 34.

9 A. Yeah. The third-generation part --
10 the third-generation partnership new radio
11 discussion.

12 Is that where it starts from?

13 Q. Yeah. Is the 3GPP new radio
14 discussion about 5G?

15 A. Typically, "new radio" refers to 5G.

16 Q. Okay. Thank you.

17 ATTORNEY GOLDBERG: I have no
18 further questions.

19 ATTORNEY PYMENTO: All right.
20 Should we take a ten-minute break, if
21 that's okay?

22 ATTORNEY GOLDBERG: Sure.

23 - - -

24 (Whereupon, a short recess was
25 taken.)

31

1 - - -
2 E X A M I N A T I O N
3 - - -

4 BY ATTORNEY PYMENTO:

5 Q. All right. Mr. Gomez, could you
6 please turn to Figure 5 of the '081 patent?

7 **A. I'm here.**

8 Q. Do you recall counsel asked you
9 questions about how many radio signals there
10 were in Figure 5?

11 **A. Yes, I do.**

12 Q. Could you tell me which are the radio
13 signals in Figure 5?

14 A. It would be -- the first radio signal
15 and the second radio signal are identified in
16 Figure 5 as radio signals.

```
17         There are other signals that
18 include information.
```

19 Q. How many signals are there in total
20 in Figure 5?

21 A. Well, there's first radio signal,
22 second radio signal, third information, first
23 information, and second information.

24 Q. And the second information signal is
25 different than the first information signal,

1 correct?

2 **A. That's correct.**

3 Q. And the first information signal is
4 different than the third information signal,
5 correct?

6 **A. Yes, it is.**

7 Q. Could you please turn to Figure 7 of
8 the '081 patent?

9 Do you recall counsel asked a
10 series of hypotheticals about transport blocks
11 with respect to this figure?

12 **A. I do.**

13 Q. Does Figure 7 show a transport block
14 or TB?

15 **A. No, it does not.**

16 Q. To your recollection, does the
17 '081 patent discuss the concept of a transport
18 block?

19 **A. No, it does not.**

20 ATTORNEY PYMENTO: No further
21 questions.

22 - - -

23 (Whereupon, a short recess was
24 taken.)

25 - - -

1 ATTORNEY GOLDBERG: No further
2 questions.

3

4

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(Whereupon, the deposition
was concluded at 11:15p.m.)

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CERTIFICATE

I HEREBY CERTIFY that the
proceedings, evidence and objections are
contained fully and accurately in the
stenographic notes taken by me upon the
deposition of MIGUEL GOMEZ, taken on 3/12/24
and that this is a true and correct
transcript of same.

Jennifer Miller

Jennifer Miller, RMR, CCR, CRR
and Notary Public

(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means
unless under the direct control and/or
supervision of the certifying reporter.)

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