

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUASAR SCIENCE LLC

Petitioner,

v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT LED

Patent Owner.

Case: IPR2023-00611
U.S. Patent No. 10,197,224

**PATENT OWNER'S OBJECTIONS TO DEPOSITION OF YA
JUN ZHANG AS NON-ROUTINE DISCOVERY**

On Friday April 19, 2024, Petitioner filed and served a Notice of Deposition of Ya Jun Zhang. Paper No. 37. Patent Owner objects to the deposition, because it is not routine discovery and because there is no agreement of the parties, and other reasons.

- 1) NOT ROUTINE DISCOVERY: 37 CFR 42.51(b)(1)(ii) – Mr. Zhang’s declaration filed by patent owner was not prepared for this/these IPR proceedings. Mr. Zhang’s declaration was from 2018 for a district court case pending at the time. Accordingly, Board permission must be obtained before noticing (and taking) this deposition.
- 2) NO AGREEMENT as to any deposition of Mr. Ya Jun Zhang. 37 CFR 42.53(d)(1). Patent Owner has not agreed to any deposition of Mr. Zhang and has not agreed to any time, place or manner for any such deposition.
- 3) OTHER REASONS: Patent Owner reserves the right to oppose any motion for additional discovery for all appropriate reasons.

Dated: April 20, 2024

By: /David L. Hoffman/

David L. Hoffman, Lead Counsel for
Patent Owner Colt, Reg. No. 32,469

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S OBJECTIONS TO DEPOSITION OF YA JUN ZHANG AS NON-ROUTINE DISCOVERY** was served on April 20, 2024, via email directed to counsel of record for Petitioner at the following:

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Respectfully submitted,
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