

**In the Matter Of:**  
**Quasar Science vs Colt Intl. Clothing**

IPR2023-00613 and IPR2023-00614

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**BRUCE WONDERLICK**

*April 17, 2024*

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UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD  
QUASAR SCIENCE LLC, ) Case No.  
Petitioner, ) IPR2023-00613  
vs. ) IPR2023-00614  
COLT INTERNATIONAL )  
CLOTHING, IC. d/b/a COLT ) Pages 1-122  
LED, )  
Patent Owner. )

REMOTE DEPOSITION OF BRUCE WONDERLICK  
TAKEN ON  
WEDNESDAY, APRIL 17, 2024

Reported by:  
BRENDA R. COUNTZ, RPR-CRR  
CSR NO. 12563  
Job No. J11102056



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Remote deposition of BRUCE WONDERLICK  
taken via Zoom or teleconference in Los Angeles,  
California, on Wednesday, April 17, 2024, before  
Brenda R. Countz, CSR No. 12563.



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1 APPEARANCES OF COUNSEL:  
2 (All counsel and participants present  
3 / via Zoom and/or teleconference.)  
4

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21 ALSO PRESENT:

22 FRED FELLMETH, ESQ., In-house Counsel  
23 for Petitioner  
24  
25



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I N D E X

| WITNESS          | EXAMINATION BY | PAGE |
|------------------|----------------|------|
| BRUCE WONDERLICK |                |      |
|                  | Mr. Ward       | 5    |
|                  | Mr. Hoffman    | 114  |

E X H I B I T S

| NO. | DESCRIPTION   | PAGE |
|-----|---------------|------|
|     | (none marked) |      |



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1 LOS ANGELES, CA - WEDNESDAY, APRIL 17, 2024

2 9:32 A.M.

3

4 BRUCE WONDERLICK,  
5 having been first duly sworn, was  
6 examined and testified as follows:

7

8

9 EXAMINATION

10 BY MR. WARD:

09:32:55AM

11 Q. Good morning, Mr. Wonderlick. Can you  
12 state your full name and address for the record  
13 for us?

14 A. Bruce Wonderlick, 2842 East Shady  
15 Forest Lane, Orange, California 92867.

09:33:12AM

16 Q. Thank you, and can I call you Bruce?

17 A. Sure.

18 Q. Bruce, my name is Trent Ward. I'm an  
19 attorney with the law firm of Greenberg Traurig  
20 and I'm counsel for petitioner Quasar Science in  
21 this -- in these cases, I should say.

09:33:27AM

22 Bruce, are you aware that you are here  
23 for a deposition in connection with certain inter  
24 partes review proceedings?

25 A. Yes.

09:33:42AM



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1 Q. And Bruce, just for the purposes of the  
2 record here, I'm going to go ahead and give those  
3 IPR case numbers. They are IPR 2023-613 and IPR  
4 2023-614.

5 Bruce, do you understand that you are  
6 under oath today?

09:33:58AM

7 A. Yes.

8 Q. And do you understand that this means  
9 that you are sworn to tell the truth as if you  
10 were in a courtroom in front of a judge and jury,  
11 correct?

09:34:06AM

12 A. Yes.

13 Q. Is there any reason, Bruce, that you  
14 could not testify truthfully today?

15 A. No.

09:34:16AM

16 Q. Bruce, are you represented by an  
17 attorney in this matter?

18 A. No.

19 Q. Do you understand that Mr. Hoffman is  
20 representing Colt International Clothing,  
21 correct?

09:34:29AM

22 A. Yes.

23 Q. So he's not your attorney, correct?

24 A. No.

25 Q. Bruce, are you being paid for your

09:34:37AM



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1 attendance here today?

2 A. No.

3 Q. Were you compensated for the  
4 declaration that you provided?

5 A. No.

09:34:46AM

6 Q. Has it been indicated that you would  
7 receive a fee, were the Colt party to be  
8 successful?

9 A. No.

10 Q. So you're not receiving, nor will you  
11 receive any compensation with respect to this  
12 case?

09:35:01AM

13 A. Correct.

14 Q. Bruce, have you been deposed before?

15 A. No.

09:35:11AM

16 Q. Okay. Well, in that case, Bruce, I'll  
17 just go over a couple of deposition rules for you  
18 and kind of lay the ground work for what we're  
19 going to do this morning.

20 I've asked you some questions about  
21 these proceedings and I may from time to time  
22 share some documents with you. And Bruce, what  
23 I'll do since we are conducting this deposition  
24 remotely, I'll share those on screen via Zoom and  
25 identify those particular documents.

09:35:25AM

09:35:44AM



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1                   Our court reporter, Brenda, is going to  
2                   do her best to try and transcribe exactly what is  
3                   said during the deposition today. So one thing  
4                   for us to keep in mind is to try not to speak  
5                   over each other. And it will happen from time to  
6                   time but I would ask that -- I'll try and keep it  
7                   in mind. I'll probably do it a time or two  
8                   myself.

09:36:00AM

9                   I will wait for you to finish an answer  
10                  before I ask the next question and I'll just ask  
11                  the same of you; if you could wait for me to  
12                  finish my question before you start answering.

09:36:14AM

13                  Does that sound good?

14                  A.    Yes.

15                  Q.    And Bruce, when I ask a question, if  
16                  you don't understand it will you ask for  
17                  clarification of that question?

09:36:27AM

18                  A.    Yes.

19                  Q.    So if I ask a question and you provide  
20                  an answer, can I assume you've understood the  
21                  question?

09:36:40AM

22                  A.    To the best of what I understand of the  
23                  question, yes.

24                  Q.    Okay. And Bruce, if your counsel  
25                  objects to one of my questions, generally you are

09:36:51AM



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1 required to answer the question unless your  
2 counsel instructs you not to answer.

3 Do you understand?

4 A. Yes.

5 Q. Now, one other thing for Brenda's  
6 benefit for the transcript today is for us to try  
7 to remember to give verbal answers like yes or no  
8 because it's hard to put an uh-huh or a head nod  
9 on the record. So just try to remember to give  
10 yes-or-no answers.

09:37:03AM

09:37:19AM

11 Also, we'll take breaks from time to  
12 time, Bruce. We'll take breaks from time to  
13 time. My cadence is typically I go for about an  
14 hour and take a break but I'm happy to take a  
15 break any time you need one. Just let me know.

09:37:35AM

16 My only request to you would be that if  
17 we are going to take a break I would just ask  
18 that you finish answering whatever question is  
19 open at that time before we go on break.

20 Sound good?

09:37:48AM

21 A. Yes. If I could just give you a heads  
22 up, I've had a little stomach issue. Last night  
23 I almost went to the hospital. If I run,  
24 understand I apologize. I almost went to the  
25 hospital. I've been good this morning so

09:37:59AM



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1 everything is good.

2 On the off chance I do, understand I'm  
3 fighting something. My wife almost took me to  
4 emergency room last night.

5 Q. Well, Bruce, sorry to hear that but  
6 glad to hear you are feeling better today.

09:38:10AM

7 A. Thank you.

8 Q. And thank you so much for showing up  
9 for a deposition. Not exactly what you want to  
10 put on your calender for the day when you're not  
11 feeling good. So thank you.

09:38:20AM

12 And yes, feel free if your camera goes  
13 off, we will know where you are headed.

14 A. I will scream, "I apologize." You will  
15 know it in my face.

09:38:33AM

16 Q. Okay. Okay. Sounds good.

17 Bruce, since we are doing this  
18 remotely, just a couple of specific questions for  
19 you for a remote deposition. I just want to  
20 understand kind of what's in front of you and  
21 what you're looking at.

09:38:47AM

22 So do you have any documents in front  
23 of you, Bruce?

24 A. I do not but in theory I have my  
25 declaration on a computer next to me. But I

09:39:01AM



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1 haven't even pulled it up yet. But if I need to  
2 go to it, I will have it up.

3 Q. So you've got two computers in front of  
4 you right now?

5 A. Yes.

09:39:12AM

6 Q. Okay. And both of them are on?

7 A. Yes.

8 Q. So tell me, the computer that you are  
9 using for the Zoom call, what windows do you have  
10 open on that computer?

09:39:24AM

11 A. What windows? I have my Yahoo mail,  
12 which is where the link came from, and I have  
13 Zoom up on this one. My other one is just from  
14 my work thing. It's actually got several things  
15 up but nothing that belongs to -- do you want to  
16 see the screen?

09:39:44AM

17 Q. No, no, I don't need to see the screen.  
18 I was just going to say I would appreciate it if  
19 you can just minimize everything except for the  
20 Zoom window on the primary computer?

09:40:02AM

21 A. Oh, nothing is on it but the Zoom.  
22 Nothing is on the screen but the Zoom. That's  
23 why I opened the other one, so I can see the full  
24 picture. If you pull something up, I'll be able  
25 to see it. That's why I use my -- on my work

09:40:13AM



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1 computer I have the declaration.

2 Q. Okay. Well, I was just going to ask,  
3 the second computer, if you could just turn that  
4 monitor off or close that one down for me?

5 A. Closed.

09:40:24AM

6 Q. Okay, good.

7 And then so what about you said no hard  
8 documents. You have don't have of any --

9 A. No papers in front of me. I was just  
10 going to use my computer for my declaration if I  
11 need to go to it.

09:40:35AM

12 Q. Sounds good. The other thing too,  
13 Bruce, it sounds like you have the other  
14 computer, you closed that one.

15 Any other computers or phones,  
16 electronics?

09:40:45AM

17 A. No.

18 Q. Okay. I assume you've got your phone  
19 by you?

20 A. Well, my phone is on the table but not  
21 near me.

09:40:52AM

22 Q. Okay. So the only thing I'll ask,  
23 Bruce, no problem if you get a text or phone call  
24 or something like that you have to take. Feel  
25 free to just let us know. But when you do get a

09:41:04AM



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1 communication I'll just ask that you let me know  
2 you've got a communication.

3 Does that sound good?

4 A. In theory I will not even pay attention  
5 if it goes off unless something happens where it  
6 goes off like ten times in a row, I would pick it  
7 up.

09:41:14AM

8 Q. Okay, and Bruce, you understand that  
9 when we take a break, you are not to discuss your  
10 testimony with anyone, including Mr. Hoffman,  
11 correct?

09:41:28AM

12 A. Correct.

13 Q. All right. So Bruce, what did you do  
14 to prepare for the deposition today?

15 A. I read my declaration yesterday and  
16 I've talked to Mr. Hoffman. And he just went  
17 through the procedures to tell me that basically,  
18 the same thing you just repeated. If he objects,  
19 I still have to answer. Just kind of an informal  
20 through the process.

09:41:38AM

21 Q. So we made you go through this twice?

22 A. Yes.

23 Q. Did you review any documents with  
24 Mr. Hoffman?

25 A. Briefly, yes.

09:41:59AM

09:42:09AM



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1 Q. Okay, what did you review?

2 A. What's that?

3 Q. What did you review, Bruce?

4 A. We reviewed the case numbers, which he  
5 said I didn't need to remember. He asked me if I  
6 had looked at the patents, which I had. And then  
7 just kind of went over verbiage, more so just  
8 saying if you ask me questions that if something  
9 comes up, make sure I ask for clarification if  
10 something seems vague.

09:42:17AM

11 Listen to the words you say to make  
12 sure I hear the words that you say, not what I  
13 hear, which is why I answered to the best of my  
14 knowledge of how I understand the question,  
15 obviously.

09:42:37AM

09:42:50AM

16 Q. Understood. So you took a look at the  
17 two patents here?

18 A. Yes, I've taken a look at them. I did  
19 not today.

20 Q. So not in preparation for this  
21 deposition?

09:43:01AM

22 A. Not in preparation for this, no.

23 Q. So you only looked at your declaration  
24 in preparation for today's deposition?

25 A. Correct.

09:43:10AM



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1 Q. Okay. Bruce, can you briefly describe  
2 for us your educational background?

3 A. I had some college at Cal State  
4 Fullerton.

5 Q. Okay, what did you study at Cal State  
6 Fullerton?

09:43:24AM

7 A. Business.

8 Q. Okay. And what years was that, Bruce?

9 A. '90 through '95, and then I got into  
10 the business and -- yeah, that's all.

09:43:38AM

11 Q. What do you mean, you got into the  
12 business?

13 A. I got into the set lighting business,  
14 the motion picture business, so I stopped going  
15 to school.

09:43:58AM

16 Q. So you did not receive a bachelor's  
17 degree?

18 A. Nope. I'm 18 units short.

19 Q. And what was your first position? What  
20 was your first job in set lighting?

09:44:24AM

21 A. I was a rigger on set -- or a rigger on  
22 the lot.

23 Q. And which company was that for?

24 A. Paramount Pictures. I've never worked  
25 or been hired by anyone else other than

09:44:38AM



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1 Paramount. I've only worked for one.

2 Q. Okay, so in 1995 Paramount hired you?

3 A. Correct.

4 Q. And the position at that time was set  
5 rigger?

09:44:53AM

6 A. Yes. There was no -- like you could be  
7 anything, whatever. That's what they put me at.  
8 And you kind of start there and they put you on  
9 whatever show. You could be in a different  
10 position every day.

09:45:07AM

11 Q. So what were you doing initially?

12 A. Putting in rigs a lot. Sometimes I was  
13 working on shows on set, sometimes different  
14 aspects.

15 And I did that up until 1998 they made  
16 me a lot best boy. Or maybe it was '97. '97  
17 they made me a lot best boy. And then I did that  
18 through '99 and then end of April '99 I took the  
19 position I currently have.

09:45:20AM

20 I took doing rentals. I've moved up  
21 over time but the same actual job.

09:45:39AM

22 Q. So in 1997 you were promoted to best  
23 boy?

24 A. Correct.

25 Q. And what were you doing as a best boy?

09:45:53AM



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1           A.    There's different shows that I worked  
2   on, just put in orders, supplied equipment and  
3   manpower for my show.

4           Q.    Okay.  Maybe you could just give us an  
5   example of a particular project.

09:46:12AM

6           A.    There was a show, George & Leo.

7           MR. HOFFMAN:  I think, Bruce, if  
8   there's a way to turn up your mic or move it  
9   maybe just a little closer, that might help.

10          THE WITNESS:  Sorry, this is the first  
11   time I'm doing a Zoom on this so I'm not even  
12   sure how to do any of this.

09:46:38AM

13          MR. HOFFMAN:  I'm not sure where your  
14   mic is, but if it's on the computer just maybe  
15   bring the screen just a little bit closer.

09:46:52AM

16          MR. WARD:  Let's go off the record.

17          (Discussion held off the record.)

18   BY MR. WARD:

19          Q.    So Bruce, you were giving us an example  
20   of a project that you worked on as a best boy in  
21   the 1997 to 1999 time period.

09:48:05AM

22          So describe for us what your duties  
23   would have been.  What specifically would you  
24   have done for, you mentioned the George & Leo  
25   program.

09:48:20AM



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1           A.    I would -- the gaffer would give me the  
2 orders for what he wanted. I would turn them in  
3 to the rental department and I would get the  
4 equipment and bring it back and then I would have  
5 guys who would install it.

09:48:34AM

6           Q.    So you were working to configure  
7 lighting for a set. Is that an accurate  
8 description?

9           A.    Correct.

10          Q.    Okay. And then you said in April 1999  
11 you were promoted to a new position.

09:48:50AM

12                  What was that?

13          A.    I was a rental agent.

14          Q.    And what was your specific title in  
15 April of 1999?

09:49:06AM

16          A.    We called then rental agents.

17          Q.    Okay. And what department were you  
18 with at Paramount at that time?

19          A.    Set lighting.

20          Q.    And what things were you in charge of  
21 renting as the rental agent?

09:49:24AM

22          A.    There, I would do what my current job  
23 is. The productions would give me a list and it  
24 was my job to supply them the equipment, whatever  
25 it was.

09:49:39AM



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1 Q. And what types of equipment did you  
2 supply, Bruce? I just wanted to have an  
3 understanding of what's available for rent.

4 A. All lighting equipment, whatever was  
5 needed; cable, lights, distro (sp).

09:49:48AM

6 Q. And anything other than lighting  
7 equipment?

8 A. Ladders.

9 Q. And by ladders, you mean equipment upon  
10 which lights are rigged, correct?

09:50:06AM

11 A. Ladders which guys climb up in order to  
12 rig the lights.

13 Q. Oh, so not the ladder for the light  
14 rigging but a human ladder is what you are  
15 describing?

09:50:21AM

16 A. Correct.

17 Q. So ladders and lighting equipment.  
18 Any other equipment?

19 A. Carts to move things around; basically  
20 that. I can't think of anything else  
21 specifically but I'm sure there are other kinds  
22 of lighting.

09:50:41AM

23 Q. Okay. Bruce, how about expendables,  
24 did you rent expendables?

25 A. Expendables do not rent. They are in

09:50:56AM



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1 sales and no, I don't do any expendables.

2 Q. So the expendables department is  
3 separate from the rental department?

4 A. Correct.

5 Q. And does the expendables department  
6 provide lighting?

09:51:12AM

7 A. Generally no.

8 Q. And what do you mean by, "Generally,  
9 no"?

10 A. On a rare occasion there were times  
11 when it has provided some rental equipment but  
12 generally no. And currently, no.

09:51:26AM

13 Q. So is there a division at Paramount  
14 between goods that are expendable goods that are  
15 handled by the expendable department and then  
16 lighting products that are handled by the rental  
17 department?

09:51:55AM

18 A. Yes.

19 Q. And has that historically been true for  
20 your entire time at Paramount?

09:52:05AM

21 A. It is for the most part always true.

22 Q. When is it not true, Bruce?

23 A. There's a handful of times where if  
24 Fernando, who does our expendables, if he is not  
25 around and somebody needs an expendable order

09:52:21AM



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1 right away, that I've had to make an order  
2 because the customer needs it right away.

3 Or if, say, something is not in a  
4 lighting order, somebody else would have to do a  
5 rental.

09:52:35AM

6 Q. So there are times just for staffing  
7 needs when you would fill in for Fernando Silva?

8 A. Yes, I've probably done it ten times in  
9 25 years.

10 Q. And are there times when Fernando Silva  
11 has filled in for you in the rental department?

09:53:09AM

12 A. It wouldn't be me, it could be anyone,  
13 because there are other people who do my job.  
14 Yes.

15 Q. And has your title changed since April  
16 1999?

09:53:26AM

17 A. Yes. We have gone through several  
18 changes based on industry things. We became  
19 customer service representatives. I am currently  
20 paid as a first lighting electrician, although  
21 I'm still a customer service representative.

09:53:47AM

22 Q. You say in your declaration that you  
23 are currently the set lighting rental manager.

24 Is that your title or is that just a  
25 description of your position?

09:54:06AM



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1           A.    That is not an occupational code within  
2   our system. It was more my title for then. I am  
3   the head guy who does rentals. That's why now  
4   I'm paid as the first lighting electrician, which  
5   is the actual title because there is no -- within  
6   our -- because we are union, there is no  
7   occupational code for rental manager.

09:54:24AM

8                   But that is what -- at one point the  
9   business cards, when they did make them for us,  
10   that's what my business card said.

09:54:39AM

11          Q.    So you no longer are provided with  
12   business cards?

13          A.    No.

14          Q.    Okay. So in the roughly 25 years since  
15   April of 1999, you've served in the rental  
16   department primarily as a set lighting rental  
17   manager, correct?

09:54:56AM

18          A.    If 50 percent is more than 50 percent,  
19   then yes.

20          Q.    Okay, what other duties do you have,  
21   Bruce?

09:55:19AM

22          A.    Well, no, it's just that. It was just  
23   whether I did just rentals or who was the lead  
24   guy as people have moved. When I came in I was  
25   the low man on the totem pole within the rental

09:55:30AM



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1 department.

2 And then as people have moved up and/or  
3 left, I have moved up.

4 Q. So Bruce, can you describe to us that  
5 progression; who was your boss initially and when  
6 did it change?

09:55:51AM

7 A. My timeframe may be a little off. When  
8 I first came in Craig Chaipuzio,  
9 C-H-A-I-P-U-Z-I-O, was my boss.

10 Q. And roughly what time period would that  
11 have been, Bruce?

09:56:27AM

12 A. He went from '99 -- he left around  
13 2003-2004.

14 Q. And who became your boss in the  
15 2003-2004 time period?

09:56:39AM

16 A. John Cybulski, C-Y-B-U-L-S-K-I.

17 Q. And that would have been from 2003 to  
18 what year?

19 A. To October 2010.

20 Q. And were you in the same position as  
21 far as your -- you said on the totem pole, you  
22 came in as the low man on the totem poll.

09:57:09AM

23 When did you move up the pole?

24 A. In 2007, I would say, I think it was  
25 2006-2007.

09:57:23AM



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1 Q. And did you have a new title at that  
2 time?

3 A. Then they would call me rental manager.

4 Q. But you were still reporting to John  
5 Cybulski in 2007, correct?

09:57:39AM

6 A. Correct, yes.

7 Q. And who became your boss after John  
8 Cybulski?

9 A. Carl Distefano.

10 Q. Can you spell that last name for us?

09:57:51AM

11 A. D-I-S-T-E-F-A-N-O.

12 Q. And what time period was he your boss?

13 A. He started in 2011 and is still my  
14 current boss.

15 Q. Okay. And you said you were promoted  
16 in 2007 to rental manager. Are you still in that  
17 position today?

09:58:15AM

18 A. Yes.

19 Q. So since 2007 you've been in the same  
20 position?

09:58:29AM

21 A. Correct.

22 Q. And what is Carl Distefano's title?

23 A. Executive vice-president.

24 Q. So he oversees a number of departments,  
25 including your rental department?

09:58:46AM



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1 A. Yes.

2 Q. And how many other employees are there  
3 in the rental department?

4 A. Doing actual rentals for lighting,  
5 there are two other guys.

09:58:58AM

6 Q. And do they report to you?

7 A. Technically, yes.

8 Q. And why do you say "technically"?

9 A. Because we work very collaboratively.  
10 Everybody has certain duties that they do and we  
11 tend not to get into other people's stuff unless  
12 needed.

09:59:16AM

13 But I am the highest person as far as  
14 the team. So if something needs to be done, Carl  
15 tells me to take care of it.

09:59:34AM

16 Q. And Bruce, you mentioned earlier that  
17 you've been employed by Paramount since 1995,  
18 correct?

19 A. Correct.

20 Q. And have you held any other positions  
21 with other companies?

09:59:51AM

22 A. No.

23 Q. Have you had affiliations with any  
24 other companies?

25 A. No.

10:00:00AM



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1 Q. Have you owned any other companies?

2 A. No.

3 Q. So your professional experiences have  
4 been entirely at Paramount?

5 A. Time out. When you say owned other  
6 companies you're not -- I'm a stockholder or  
7 shareholder in several companies and different  
8 things. I've invested in several different  
9 things.

10:00:13AM

10 But lighting companies, no. Rental  
11 companies, no. I have nothing to do with it. I  
12 have no ownership in it.

10:00:25AM

13 MR. WARD: Let's go off the record.  
14 (Break taken.)

15 MR. WARD: Bruce, I'm going to share  
16 with you now a document that has been marked as  
17 Exhibit 1031. I'm going the share it on the  
18 screen here.

10:02:34AM

19 BY MR. WARD:

20 Q. Can you see my screen, Bruce?

10:02:55AM

21 A. I cannot.

22 Q. Are you looking at the Zoom window?

23 A. I am but it's not big enough.

24 Q. Okay, sure.

25 So this is a one-page document and I'm

10:03:07AM



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1 going to show you the bottom of the document  
2 where it is marked as Exhibit 1031 for IPR  
3 2023-613.

4 Do you see that?

5 A. Where?

10:03:21AM

6 Q. The bottom of the document. Are you  
7 able to see my cursor?

8 A. Okay, yes.

9 Q. So it's marked Exhibit 1031 for IPR  
10 2023-613, correct?

10:03:31AM

11 A. Correct.

12 Q. Okay. Bruce, this is a copy of a State  
13 of California Secretary of State Statement of  
14 Information for Motion Pictures Expendables and  
15 Services LLC.

10:03:48AM

16 What is Motion Picture Expendables and  
17 Services LLC?

18 A. It was a company that was put together  
19 so that Michael Cybulski could sell expendables,  
20 if he needed to, because he was selling  
21 batteries. He had a battery business originally.  
22 Or now he's turned it into his own battery  
23 business.

10:04:02AM

24 Q. And is Michael Cybulski the same  
25 individual that you identified previously as John

10:04:17AM



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1 Cybulski?

2 A. No. It is his son.

3 Q. And the middle of the page in  
4 Exhibit 1031 it provides the name and complete  
5 address of managers of the Motion Picture  
6 Expendables and Services LLC, and the first name  
7 is Michael Cybulski.

10:04:36AM

8 And that's who you've identified as the  
9 son of your previous boss, John Cybulski?

10 A. Correct.

10:04:50AM

11 Q. And you see that you are listed as a  
12 manager, correct?

13 A. I do.

14 Q. And Fernando Silva is also listed as a  
15 manager?

10:05:03AM

16 A. I see that.

17 Q. Can you tell me about what was your  
18 involvement with Motion Picture Expendables and  
19 Services?

20 A. Very little involvement. It ended up  
21 being no involvement, really. I should say very  
22 little involvement.

10:05:15AM

23 At the time we had a new boss. Not  
24 Carl, above Carl, and I was concerned I would be  
25 out of a job. And Michael was setting this up as

10:05:31AM



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1 a business, along with Todd Young who I would  
2 expect to have been on this.

3 So I ended up doing basically nothing  
4 with it.

5 Q. Who is Todd Young?

10:05:48AM

6 A. He is a man who worked in the -- I know  
7 he was a rep of a sales company that did lights  
8 who was looking to get out and then ended up  
9 getting out completely. And he has recently  
10 passed a year or so ago.

10:06:08AM

11 But he was a guy that we used to use  
12 for lights and then he ended up getting large.  
13 He became a fairly big company.

14 Q. And when do you remember MP Expendables  
15 starting, what year?

10:06:29AM

16 A. I don't remember.

17 Q. The filing date listed on this  
18 particular document is shown up here in the top  
19 right-hand corner as February 14, 2011.

20 Does that sound accurate as a starting  
21 date for MP Expendables?

10:06:43AM

22 A. Yes.

23 Q. So the goal of MP Expendables would  
24 have been to provide expendables and other  
25 services to tv film sets?

10:07:00AM



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1 MR. HOFFMAN: Objection to form.

2 THE WITNESS: Yes.

3 BY MR. WARD:

4 Q. What types of products were provided  
5 with this?

10:07:18AM

6 A. I'm not sure.

7 Q. And how is it that you're not sure?

8 A. Because I don't recall what was done  
9 with it. I would assume obviously expendables  
10 but I'm not sure what was done. I don't know  
11 where Michael took it or what he did with it  
12 before he branched off on his own.

10:07:38AM

13 Q. You said that you were looking at this  
14 as a possible option if you were no longer  
15 employed by Paramount, correct?

10:07:55AM

16 A. Correct.

17 MR. HOFFMAN: Objection,  
18 mischaracterization, foundation.

19 BY MR. WARD:

20 Q. And what do you envision your role  
21 would have been, had you pursued MP Expendables?

10:08:02AM

22 A. I don't know. I would have had to  
23 figure something out. I don't do that business  
24 so I would not have necessarily been very  
25 helpful.

10:08:22AM



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1 Q. And when you say you don't do that  
2 business, what do I mean by "that business"?

3 A. Expendables.

4 Q. Is that more of the business of  
5 Fernando Silva?

10:08:34AM

6 A. Yes.

7 Q. And is it your understanding that  
8 Fernando Silva worked with MP expendables?

9 A. I don't know what his interaction was  
10 with Michael.

10:08:48AM

11 MR. WARD: I want to show you on screen  
12 now another exhibit. (Perusing.)

13 I'm sharing on screen now Exhibit 1028.  
14 I'm going to make it big enough where you can  
15 actually see it, Bruce.

10:09:40AM

16 BY MR. WARD:

17 Q. You can see in the bottom right-hand  
18 corner here this is labeled Exhibit 1028 from IPR  
19 2023-613, correct?

20 A. Correct.

10:09:53AM

21 Q. Exhibit 1028 provides an e-mail thread  
22 that's dated December of 2012 and the e-mail is  
23 from Fernando Silva to Motion Pictures  
24 Expendables and Services.

25 Do you see that?

10:10:12AM



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1 A. I believe it's the opposite.

2 Q. Oh, I'm sorry. Did I say the opposite?

3 So it's to Fernando Silva, you are  
4 correct, and it's from MP Expendables, correct?

5 A. Correct.

10:10:27AM

6 Q. And the subject line says invoice 4977  
7 from Motion Picture Expendables and Services,  
8 correct?

9 A. Yes.

10 Q. And then the next e-mail above that in  
11 this e-mail thread is an e-mail from Fernando  
12 Silva to another e-mail address which is  
13 spiff595@earthlink.net correct?

10:10:41AM

14 A. Yes.

15 Q. So do you recall a time when MP  
16 Expendables was sending invoices to Paramount?

10:11:04AM

17 MR. HOFFMAN: Objection, form,  
18 foundation.

19 THE WITNESS: No.

20 BY MR. WARD:

09:48:00AM

21 Q. Do you remember Fernando Silva  
22 processing invoices from MP Expendables?

23 MR. HOFFMAN: Objection, form,  
24 foundation.

25 THE WITNESS: No.

10:11:26AM



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1 MR. WARD: So Bruce, this e-mail, the  
2 subject references invoice 4977 and I'm going to  
3 show to you now what's marked as Exhibit 1027.

4 THE WITNESS: Okay.

5 MR. WARD: IPR 2023-613.

10:12:06AM

6 BY MR. WARD:

7 Q. And you will see in the top right-hand  
8 corner that this invoice is invoice number 4977  
9 from MP Expendables.

10 Do you see that?

10:12:20AM

11 A. Yes, if you did not hear me.

12 Q. Sorry, I didn't.

13 So would you agree that the invoice  
14 number matches the invoice number previously  
15 shown in Exhibit 1028, invoice number 4977?

10:12:42AM

16 A. Yes.

17 Q. And what is listed in this invoice,  
18 what materials are identified in this invoice?

19 MR. HOFFMAN: Objection, form,  
20 foundation.

10:13:00AM

21 THE WITNESS: Items that would be sold  
22 as expendables.

23 BY MR. WARD:

24 Q. And would these items have been sold as  
25 expendables by the Paramount expendable

10:13:12AM



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1 department?

2 MR. HOFFMAN: Objection, foundation.

3 THE WITNESS: That's not what I do.

4 BY MR. WARD:

5 Q. So you're not aware of whether or not  
6 Paramount expendables department sells gaffers  
7 tape?

10:13:25AM

8 A. They do sell gaffers tape.

9 Q. Do they sell rubber matting?

10 A. I do not know if they do or not.

10:13:36AM

11 Q. Do you know if they sell black photo  
12 tape?

13 A. Yes.

14 Q. So is it your understanding that the  
15 services provided in this invoice would have been  
16 competitive to the Paramount expendables  
17 department?

10:13:52AM

18 MR. HOFFMAN: Objection, form,  
19 foundation.

20 THE WITNESS: Potentially, but we can  
21 only sell to certain customers so in this  
22 particular case, no, because we could not sell to  
23 SJC Lighting.

10:14:04AM

24 BY MR. WARD:

25 Q. Who is SJC Lighting?

10:14:15AM



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1 A. I have no idea.

2 Q. How do you know you can't sell to them?

3 A. Because we have a customer base we can  
4 only sell from. Like I know we could not  
5 purchase from Motion Picture Expendables and  
6 Services because they are not a vendor in our  
7 system. We can only purchase from certain people  
8 and we can only sell to certain people.

10:14:25AM

9 Q. The bill-to line appears to identify  
10 SIC Lighting, correct?

10:14:52AM

11 A. Yes.

12 Q. And are you aware of SIC Lighting?

13 A. No.

14 Q. But you are certain that they are not  
15 on the Paramount approved list, correct?

10:15:03AM

16 A. Yes.

17 Q. And how are you certain of that?

18 A. I get that list e-mailed to me every  
19 month.

20 Q. And how many companies are on that  
21 list?

10:15:14AM

22 A. That are active, about 25.

23 Q. How about non-active?

24 A. Several.

25 Q. I'm sorry, how many?

10:15:29AM



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1 A. Several.

2 Q. Several?

3 A. In all my time there, I have never  
4 rented to SIC Lighting.

5 Q. Is it the goal of the rental department  
6 to expand the number of customers that come to  
7 Paramount?

10:15:41AM

8 MR. HOFFMAN: Objection, form,  
9 foundation.

10 THE WITNESS: No, it's not.

10:15:51AM

11 BY MR. WARD:

12 Q. So the rental department does not wish  
13 to service additional customers?

14 MR. HOFFMAN: Objection, asked and  
15 answered, form.

10:16:01AM

16 THE WITNESS: You originally said all  
17 the customers. Sure, it would like to get  
18 customers. They have a minimum want that they  
19 want to make before they will open a customer or  
20 a vendor. They have a minimum spend or a minimum  
21 purchase and currently that number is very high.

10:16:18AM

22 BY MR. WARD:

23 Q. But it is a goal of the rental  
24 department to increase the number of customers on  
25 that list, correct?

10:16:34AM



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1 MR. HOFFMAN: Objection, asked and  
2 answered, argumentative.

3 THE WITNESS: Again, I would say it  
4 depends on the size of the customer.

5 BY MR. WARD:

09:48:00AM

6 Q. But assuming that the customer is of  
7 sufficient size, it is a goal to expand the  
8 number of customers, correct?

9 A. Yes, currently.

10 Q. So would you agree that servicing  
11 customers by additional entities could represent  
12 a competition to Paramount?

10:17:04AM

13 MR. HOFFMAN: Objection, asked and  
14 answered, form.

15 THE WITNESS: Not necessarily.

10:17:18AM

16 BY MR. WARD:

17 Q. But it is possible, you would agree?

18 MR. HOFFMAN: Objection, asked and  
19 answered, form, argumentative.

20 THE WITNESS: Theoretically.

10:17:28AM

21 MR. WARD: I want to show you now,  
22 Bruce, another exhibit. It's Exhibit 1029. I'm  
23 sharing on screen now.

24 BY MR. WARD:

25 Q. Can you see this in the bottom

10:17:45AM



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1 right-hand corner, a document marked  
2 Exhibit 1029?

3 A. Yes.

4 Q. Exhibit 2019 provides an invoice from  
5 MP Expendables to True Blood with an address  
6 given and a contact of Ray Gonzalez.

10:18:02AM

7 Are you familiar with this particular  
8 invoice?

9 A. No.

10 Q. Are you familiar with True Blood?

10:18:17AM

11 A. I remember the production, yes.

12 Q. And do you recognize the address that's  
13 given here for True Blood?

14 A. It looks like it's either the lot or --  
15 I know of the area. I don't know exactly what  
16 place it is.

10:18:40AM

17 Q. What is "the lot," Bruce?

18 A. It is a studio that once used to be  
19 Spelling Productions.

20 Q. Is it affiliated with Paramount?

10:18:55AM

21 A. No.

22 Q. Do you know Ray Gonzalez?

23 A. Yes.

24 Q. How do you know Ray?

25 A. He has worked on shows that I've

10:19:07AM



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1     supplied equipment for.

2           Q.     So Ray is a customer?

3           A.     Ray is not a customer, his productions  
4     are a customer.

5           Q.     Okay.  So you've interfaced with Ray as  
6     a customer through his productions, correct?

10:19:21AM

7           A.     Yes.

8           Q.     And when is the first time you remember  
9     interacting with Ray Gonzalez?

10          A.     I think -- and I might be wrong here --  
11     but the only time I've ever dealt with him I  
12     think was on a production called Dirty Sexy  
13     Money, which went around 2006-2007.  There was a  
14     strike in '08 and it ended right after that.  I  
15     think the strike killed it.

10:19:38AM

16                 So it was 2007, 2008 I think was the  
17     only time I've ever dealt with Ray that I can  
18     recall.  And I'm not even sure that was it but  
19     that's what my mind is telling me.

10:19:57AM

20          Q.     Do you recall Ray renting lighting  
21     equipment from you?

10:20:09AM

22          A.     I remember the show Dirty Sexy Money  
23     renting lighting equipment from us.  They are the  
24     customer.  Ray just put in the orders.

25                 MR. WARD:  I'm going to share with you

10:20:32AM



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1 now another exhibit that is Exhibit 1032. The  
2 date of this is an exhibit that I e-mailed  
3 earlier. It's Exhibit 1032 to IPR 2023-613.

4 BY MR. WARD:

5 Q. Do you see that, Bruce?

10:21:05AM

6 A. Yes.

7 Q. This exhibit provides an e-mail on  
8 January 28, 2014 from Fernando Silva to Ray  
9 Gonzalez.

10 Do you see that listed at the top of  
11 the document?

10:21:17AM

12 A. Yes.

13 Q. And Mr. Silva states in this e-mail, he  
14 says, "Please review the attached quote."

15 And it provides his signature block at  
16 the bottom, "Fernando Silva, Expendables Manager,  
17 back lot operations set lighting department."

10:21:37AM

18 Do you recall Mr. Fernando Silva being  
19 the expendables manager at this time in January  
20 of 2014 at Paramount?

10:21:55AM

21 A. Yes.

22 Q. Do you remember providing quotes to Ray  
23 Gonzalez in this time period of January of 2014?

24 MR. HOFFMAN: Objection, form,  
25 foundation, scope.

10:22:15AM



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1 THE WITNESS: Can you please repeat the  
2 question?

3 BY MR. WARD:

4 Q. Yeah. Do you recall working with Ray  
5 Gonzalez in the January of 2014 time period?

10:22:24AM

6 A. Me personally, no.

7 Q. Do you recall Fernando Silva providing  
8 this quote and working with Ray in January of  
9 2014?

10 MR. HOFFMAN: Objection, form,  
11 foundation, scope.

10:22:39AM

12 THE WITNESS: No, I do not.

13 BY MR. WARD:

14 Q. You do recall that Fernando Silva was  
15 working as the expendables manager at Paramount  
16 in 2014, correct?

10:23:00AM

17 MR. HOFFMAN: Objection, form, asked  
18 and answered.

19 THE WITNESS: Yes.

20 BY MR. WARD:

09:48:00AM

21 Q. And do you recall that Mr. Silva was  
22 also working for MP Expendables at that time?

23 A. I don't know what his affiliation was  
24 to it.

25 Q. You were both listed as managers of MP

10:23:24AM



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1 Expendables, correct?

2 MR. HOFFMAN: Objection, asked and  
3 answered.

4 THE WITNESS: Yes.

5 BY MR. WARD:

09:48:00AM

6 Q. What was Mr. Silva's role with MP  
7 Expendables?

8 MR. HOFFMAN: Objection, scope, form,  
9 foundation.

10 THE WITNESS: I do not know what his  
11 exact was. I don't have a relationship with him.  
12 We both have different relationships with Michael  
13 Cybulski and Todd Young.

10:23:39AM

14 BY MR. WARD:

15 Q. Did you have an initial meeting with  
16 Mr. Cybulski to talk about your roles for MP  
17 Expendables?

10:23:51AM

18 MR. HOFFMAN: Objection, scope.

19 THE WITNESS: Yes.

20 BY MR. WARD:

09:48:00AM

21 Q. And what was stated in that initial  
22 meeting?

23 MR. HOFFMAN: Sorry, objection, scope,  
24 form, foundation, hearsay.

25 THE WITNESS: If my situation were --

10:24:27AM



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1 if my employment situation were to change, we'd  
2 find a way to work together until I could change  
3 to a different -- that situation.

4 BY MR. WARD:

5 Q. And by finding a way to work together,  
6 you would bring a skill set and Mr. Silva would  
7 bring a different skill set?

10:24:45AM

8 MR. HOFFMAN: Objection, scope,  
9 foundation.

10 THE WITNESS: I don't know what  
11 Fernando's relationship with Michael would be but  
12 I would guess possibly.

10:24:56AM

13 MR. WARD: I'm going to share now  
14 Exhibit 1026. (Perusing.) You see in the bottom  
15 right-hand corner here this is Exhibit 1026.

10:25:33AM

16 BY MR. WARD:

17 Q. Do you see that, Bruce?

18 A. Um-hum.

19 Q. Okay. This is a printout of the  
20 California Secretary of State website's  
21 information regarding Motion Picture Expendables  
22 and Services LLC.

10:25:42AM

23 Do you see the initial filing date  
24 listed there as January 10, 2011?

25 MR. HOFFMAN: Objection to the exhibit

10:25:58AM



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1 as incomplete.

2 THE WITNESS: I actually cannot. You  
3 have to expand it a little bit.

4 BY MR. WARD:

5 Q. Sure.

10:26:06AM

6 A. (Perusing.) Yes.

7 Q. Do you see that the initial filing date  
8 is January 10, 2011, correct?

9 A. Correct.

10 Q. And do you recall that being the time  
11 period when MP Expendables was created?

10:26:16AM

12 A. I honestly don't. It definitely sounds  
13 in the timeframe but I don't remember when.

14 Q. Also on Exhibit 1026 it lists the  
15 inactive date as February 26, 2016.

10:26:39AM

16 Do you see that?

17 A. Yes.

18 MR. HOFFMAN: Objection, scope.

19 BY MR. WARD:

20 Q. Do you recall that as being the date in  
21 which this entity, MP Expendables, was  
22 terminated?

10:26:48AM

23 MR. HOFFMAN: Objection, scope.

24 THE WITNESS: No.

25 BY MR. WARD:

09:48:00AM



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1 Q. When do you recall MP Expendables being  
2 closed or otherwise terminated?

3 MR. HOFFMAN: Objection, foundation,  
4 form, scope.

5 THE WITNESS: I don't recall at all.

10:27:07AM

6 BY MR. WARD:

7 Q. How long were you involved, Bruce?

8 MR. HOFFMAN: Objection, scope.

9 THE WITNESS: Because I never lost my  
10 job, I was never really that involved.

10:27:19AM

11 MR. WARD: I want to share on screen  
12 now a document that is marked as Exhibit 1030.

13 THE WITNESS: (Perusing.)

14 BY MR. WARD:

15 Q. Do you see that, Bruce?

10:27:43AM

16 A. Yes.

17 Q. This is a document that's a one-page  
18 document that describes an agreement between a  
19 number of individuals. It says, "Hereas the  
20 three partners, Jerry Mundy, Junior, J.A. Byerly  
21 and Fernando Silva, enter into a mutual  
22 agreement."

10:27:57AM

23 Do you know who Jerry Mundy is?

24 A. Yes.

25 Q. Who is Jerry Mundy?

10:28:12AM



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1 MR. HOFFMAN: Objection, scope.

2 THE WITNESS: He is a 728 member.

3 BY MR. WARD:

4 Q. And 728 is a union for what, Bruce?

5 A. Set lighting technicians.

10:28:27AM

6 Q. How long have you known Jerry?

7 MR. HOFFMAN: Objection, scope.

8 THE WITNESS: 2001-issue, whenever  
9 Nip/Tuck started.

10 BY MR. WARD:

09:48:00AM

11 Q. Did you rent equipment to Jerry Mundy  
12 for Nip/Tuck?

13 MR. HOFFMAN: Objection, scope.

14 THE WITNESS: Yes, we rented Nip/Tuck  
15 equipment.

10:29:03AM

16 BY MR. WARD:

17 Q. And have you worked with Jerry Mundy  
18 since then?

19 MR. HOFFMAN: Objection to scope.

20 THE WITNESS: Yes, he did the  
21 production in Glee after that.

10:29:11AM

22 BY MR. WARD:

23 Q. And how about J.A. Byerly, who is J.A.  
24 Byerly?

25 A. He is also a 728 member.

10:29:29AM



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1 Q. What's his role? What's his  
2 occupation?

3 A. He generally is a rigging gaffer.

4 Q. Does he work with Jerry Mundy?

5 A. He did on Glee.

10:29:44AM

6 Q. Do you recall these three individuals  
7 entering into a mutual agreement?

8 MR. HOFFMAN: Objection, foundation,  
9 scope.

10 THE WITNESS: No, I had no idea.

10:29:57AM

11 BY MR. WARD:

12 Q. The document says that they are  
13 entering into a mutual agreement concerning all  
14 creations, inventions, ideas and patents, all  
15 discussions and concerns which relate to all  
16 types of LED fixtures, LED parts and component  
17 creations, LED branding and all phases of design,  
18 partnership and equality.

10:30:10AM

19 Do you recall Mr. Silva, Mr. Mundy and  
20 Mr. Byerly having an agreement about all  
21 creations relating to all types of LED fixtures?

10:30:31AM

22 MR. HOFFMAN: Objection, scope,  
23 foundation.

24 THE WITNESS: No.

25 BY MR. WARD:

09:48:00AM



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1 Q. Have you entered into similar  
2 agreements with other individuals?

3 MR. HOFFMAN: Objection, form.

4 THE WITNESS: Are you asking me if I  
5 did something like this with LED stuff? Is that  
6 the question?

10:31:00AM

7 BY MR. WARD:

8 Q. I'm just asking if you have entered any  
9 agreements like this with other individuals or  
10 these individuals.

10:31:08AM

11 MR. HOFFMAN: Objection, form and  
12 scope.

13 THE WITNESS: Not like this, no. I  
14 have several different outside things that I do.

15 BY MR. WARD:

09:48:00AM

16 Q. But you haven't entered an agreement  
17 with any of these listed individuals, correct?

18 MR. HOFFMAN: Objection, form, scope.

19 THE WITNESS: No, other than Fernando  
20 and I are on the same paperwork for a motion  
21 picture.

10:31:49AM

22 Other than that, apparently, no.

23 BY MR. WARD:

24 Q. You said you have several outside  
25 things that you do.

10:32:01AM



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1                   What are those, Bruce?

2                   MR. HOFFMAN: Objection, scope.

3                   THE WITNESS: Different -- involved in  
4 oil companies, gas companies, finance companies,  
5 different things that I do, aspects of my life.

10:32:13AM

6 BY MR. WARD:

7           Q.     And when you say you're involved in  
8 them, how are you involved?

9                   MR. HOFFMAN: Objection, scope.

10                  THE WITNESS: It depends on the  
11 different categories. In some ways I'm just a  
12 sounding board.

10:32:24AM

13 BY MR. WARD:

14           Q.     So with respect to oil companies, how  
15 are you involved, Bruce?

10:32:47AM

16           A.     I'm invested.

17           Q.     So you've invested money in particular  
18 oil companies?

19                   MR. HOFFMAN: Objection, scope.

20                   THE WITNESS: A company, yes.

10:33:01AM

21 BY MR. WARD:

22           Q.     And also gas companies?

23                   MR. HOFFMAN: Objection, scope.

24                   THE WITNESS: Yes.

25 BY MR. WARD:

09:48:00AM



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1 Q. Have you invested in any lighting  
2 companies?

3 A. No.

4 Q. Any companies associated with TV and  
5 film?

10:33:21AM

6 A. Not that I can recall.

7 Q. Do you remember making investments in  
8 motion picture companies in the past?

9 MR. HOFFMAN: Objection, foundation,  
10 scope.

10:33:46AM

11 THE WITNESS: No.

12 BY MR. WARD:

13 Q. You said that you've also invested in  
14 finance companies, correct?

15 MR. HOFFMAN: Objection, scope.

10:33:56AM

16 THE WITNESS: Yes.

17 BY MR. WARD:

18 Q. And Bruce, when you served as a  
19 sounding board for these oil companies, gas  
20 companies and finance companies, how was it that  
21 they present you with their questions?

10:34:15AM

22 MR. HOFFMAN: Objection, scope, form.

23 THE WITNESS: The oil companies and the  
24 gas companies don't ask my opinion of anything.  
25 We will have conversations. We will talk. It

10:34:32AM



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1 depends on what it is.

2 BY MR. WARD:

3 Q. And who is "we"?

4 MR. HOFFMAN: Objection, scope.

5 THE WITNESS: The people involved and  
6 myself.

10:34:48AM

7 BY MR. WARD:

8 Q. And who are those people, Bruce?

9 MR. HOFFMAN: Objection, scope.

10 THE WITNESS: People that I invested in  
11 with financial -- not really invested because  
12 there is no money on my part. People that asked  
13 for my help.

10:35:01AM

14 BY MR. WARD:

15 Q. So they ask for your help and you  
16 haven't provided a financial investment?

10:35:09AM

17 A. No.

18 Q. And why are they asking for your help,  
19 Bruce?

20 MR. HOFFMAN: Objection, scope.

10:35:18AM

21 THE WITNESS: They ask my opinion on  
22 something. You'd have to ask them why they ask  
23 me.

24 BY MR. WARD:

25 Q. Do you have experience in oil?

10:35:31AM



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1 MR. HOFFMAN: Objection, scope.

2 THE WITNESS: No.

3 BY MR. WARD:

4 Q. Do you have experience in gas?

5 A. No.

10:35:38AM

6 MR. HOFFMAN: Objection, scope.

7 BY MR. WARD:

8 Q. Do you have experience in finance?

9 MR. HOFFMAN: Objection, scope.

10 THE WITNESS: Lots of classes and I've  
11 been investing for years.

10:35:48AM

12 BY MR. WARD:

13 Q. So they seek you out for your knowledge  
14 with respect to financial investments?

15 MR. HOFFMAN: Objection, foundation,  
16 scope, form.

10:36:03AM

17 THE WITNESS: They will ask my opinion  
18 about companies or things.

19 BY MR. WARD:

20 Q. Do they ask your opinions about any  
21 motion-picture related companies?

10:36:15AM

22 A. I have been asked at times what I think  
23 of investing into the motion picture industry.

24 Q. Does that relate to lighting for the  
25 motion picture industry?

10:36:34AM



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1 MR. HOFFMAN: Objection, form.

2 THE WITNESS: In a very small,  
3 technical way, I guess, but no.

4 BY MR. WARD:

5 Q. Bruce, do you know a lady named Sherry  
6 Xu, X-U is the last name?

10:36:56AM

7 A. I do not.

8 Q. Do you know a company by the name of  
9 Energy Revolution?

10 A. No.

10:37:09AM

11 Q. When was the first time you saw an LED  
12 tube light?

13 A. Are you asking me time or where?

14 Q. When, what year?

15 A. I can't recall the year but I would  
16 guess sometime around 2008 to 2010 was the first  
17 time I ever saw an LED light.

10:37:35AM

18 Q. The first time you saw an LED light  
19 generally or an LED tube light?

20 A. An LED tube light.

10:37:52AM

21 Q. So you'd seen LED lights prior to 2008,  
22 correct?

23 A. I want to say in that timeframe. It's  
24 all blended to me. I could not tell you the  
25 first time I saw an LED light.

10:38:07AM



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1 Q. But sometime around the 2008 to 2010  
2 time period, you saw an LED tube light, correct?

3 A. Correct.

4 Q. And whose product was that?

5 A. I would guess it was Sylvania. They  
6 were work lights for fixtures, for replacement of  
7 -- when people were starting to get away from  
8 florescent lights and fixtures.

10:38:29AM

9 Q. And do you recall what type of light  
10 was provided by that LED tube light?

10:38:47AM

11 MR. HOFFMAN: Objection, form.

12 THE WITNESS: I would assume -- I never  
13 actually owned one. I would assume they were  
14 3200 but might have had -- they probably actually  
15 -- I honestly don't know what the color was. I  
16 would guess 3200 but I don't know the color for  
17 sure. Or they would call it warm white, is what  
18 they would call it.

10:39:05AM

19 BY MR. WARD:

20 Q. Were you renting LED tube lights for  
21 Paramount in that time period, 2008 to 2010?

10:39:16AM

22 A. No.

23 Q. When did you first rent an LED tube  
24 light for Paramount?

25 A. I honestly don't know the answer to

10:39:36AM



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1 that question.

2 MR. WARD: I want to show you now  
3 another exhibit, Bruce. Let me share it on  
4 screen here.

5 THE WITNESS: (Perusing.)

10:39:50AM

6 MR. WARD: I'm sharing on screen now  
7 what has been marked as Exhibit 1023.

8 BY MR. WARD:

9 Q. Do you see that Bruce?

10 A. Um-hum.

10:40:06AM

11 Q. Bruce, Exhibit 1023 is a press release  
12 titled: "B&M Lighting and Universal Studios  
13 partner on MacTech LED lighting," dated June 3rd,  
14 2011.

15 Do you see that?

10:40:21AM

16 A. I do.

17 Q. The first paragraph of the press  
18 release says that: "B&M Lighting and Universal  
19 Studios announce an evolutionary new product,  
20 MacTech LED. Using specially-developed LED  
21 lighting tube technology, B&M Lighting has  
22 created four product lines that use 30 percent to  
23 70 percent less power than conventional lighting,  
24 offer consistent color temperatures at both  
25 daylight and tungsten, and are light weight for

10:40:33AM

10:41:01AM



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1 easy load and strike."

2 Do you remember the MacTech LED tube  
3 product, Bruce?

4 MR. HOFFMAN: Objection,  
5 mischaracterization.

10:41:16AM

6 THE WITNESS: I do, although I rented  
7 them very rarely.

8 BY MR. WARD:

9 Q. And when did you rent them, Bruce, do  
10 you recall?

10:41:29AM

11 A. I do not recall but I know at some  
12 point I did have to rent them. It would have  
13 been -- I don't remember.

14 Whenever I had to go up to Canada,  
15 whenever they made Godzilla, the first remake of  
16 Godzilla, I remember I had to rent them. They  
17 were very expensive and not very -- for our lot,  
18 they were very expensive. Universal charged a  
19 very high premium to rent them.

10:41:53AM

20 Q. So you were working to provide lighting  
21 equipment for the filming of the Godzilla remake?

10:42:17AM

22 A. I did for a couple of weeks and I went  
23 up to Canada to help them. I don't remember the  
24 year.

25 Q. So how was Universal involved in that

10:42:33AM



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1 project?

2 A. Universal was the sole proprietor to  
3 rent from. I believe in my lifetime I have  
4 rented less than ten of these ever, ten times.

5 Q. Do you recall the use of the MacTech  
6 LED tubes for the Godzilla filming occurring  
7 before September 2012?

10:43:14AM

8 A. I honestly don't remember when that  
9 was.

10 Q. Were other LED tubes available that you  
11 could have used instead of the MacTech LEDs?

10:43:32AM

12 MR. HOFFMAN: Object to the form.

13 THE WITNESS: No.

14 BY MR. WARD:

15 Q. So at that time the only option was to  
16 use the MacTech LED tubes if that was requested,  
17 correct?

10:43:43AM

18 MR. HOFFMAN: Objection, form.

19 THE WITNESS: That is what the  
20 production requested so that is what we supplied.

10:44:05AM

21 BY MR. WARD:

22 Q. Do you recall having any other LED tube  
23 options at that time?

24 A. No.

25 Q. The article provides a picture and

10:44:15AM



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1 below the picture on page two of Exhibit 1023 it  
2 says: "'Working closely with experienced film  
3 and television professionals, we spent almost two  
4 years developing high-output LED chips,' said Ray  
5 Wolf, president B&M Lighting.

10:44:33AM

6 "Using MacTech LED, a production can  
7 use only Edison plugs and stringers, utilize 50-K  
8 hour bulbs and save on air conditioning because  
9 the LED tubes run cool."

10 The products that are shown in the  
11 photo on page two here, do these resemble the LED  
12 tubes that you would have used in that Godzilla  
13 production?

10:44:49AM

14 MR. HOFFMAN: Objection, foundation,  
15 form, mischaracterization.

10:45:01AM

16 THE WITNESS: Yes.

17 BY MR. WARD:

18 Q. Do you recall what color temperature,  
19 what Kelvin color temperature those LED tubes  
20 provided?

10:45:19AM

21 A. I do not.

22 Q. The article goes on to provide a  
23 feature list and the second feature it  
24 identifies, "Consistent color temperatures at  
25 both daylight and tungsten and almost zero

10:45:34AM



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1 percent green at 93 CRI."

2 Do you recall the MacTech LED tubes  
3 providing daylight Kelvin temperature light?

4 MR. HOFFMAN: Objection, form  
5 foundation.

10:45:52AM

6 THE WITNESS: There was a tube that was  
7 daylight and a tube that was tungsten. There was  
8 not a tube that did both.

9 BY MR. WARD:

10 Q. So they were single-color tubes?

10:45:58AM

11 A. Correct.

12 Q. And would you use them simultaneously?

13 A. You could.

14 Q. For the Godzilla project, were they  
15 being used simultaneously?

10:46:16AM

16 A. I don't remember.

17 MR. HOFFMAN: Objection, foundation.

18 BY MR. WARD:

19 Q. Do you recall the CRI being 93 for the  
20 MacTech LED tubes?

10:46:29AM

21 A. I do not.

22 Q. Were gels necessary for the MacTech LED  
23 tubes?

24 MR. HOFFMAN: Objection, form,  
25 foundation.

10:46:43AM



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1 THE WITNESS: I don't know.

2 BY MR. WARD:

3 Q. When you provided the MacTech LED tubes  
4 to the Godzilla set, did you also provide gels to  
5 cover the MacTech LED tubes?

10:46:51AM

6 A. I don't know what they provided because  
7 I definitely didn't do expendables. They had a  
8 big expendables department and they would have  
9 owned all the expendables. They would have been  
10 buying gels. They would have had lots of gels  
11 there.

10:47:06AM

12 Q. So because gels are an expendable, they  
13 are not rented from your department?

14 A. They do not get rented.

15 Q. Do you recall any heat issues with the  
16 MacTech LED tubes?

10:47:24AM

17 MR. HOFFMAN: Objection, foundation,  
18 form.

19 THE WITNESS: No.

20 BY MR. WARD:

09:48:00AM

21 Q. Do you recall the MacTech LED tubes  
22 being used on any other projects?

23 A. I know years later we had them on the  
24 lot on some Nickelodeon shows. I don't remember  
25 what the show was. But I remember one particular

10:47:53AM



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1 gaffer liked them.

2 At least originally when they were on  
3 Godzilla, I don't know how they evolved, but they  
4 were not popular because they had lots of parts  
5 and pieces.

10:48:06AM

6 They showed that box but then within  
7 that box you had to run a power supply off that  
8 and it was very cumbersome. They were not a  
9 popular light.

10 Q. Do you recall them being used on  
11 Paramount for Nickelodeon?

10:48:15AM

12 A. Yes.

13 Q. And do you recall what year that would  
14 have been, Bruce?

15 A. My brain is saying sometime around 2017  
16 but no. And it might have been several  
17 productions. There was one particular gaffer who  
18 I know liked them so it was only on a few  
19 projects.

10:48:26AM

20 Q. Do you rent MacTech LED tubes?

10:48:42AM

21 A. Well, not tubes, units. Because don't  
22 we rent tubes, we rent the whole unit. It's a  
23 big unit you have to rent, it's not a tube. So  
24 it's a fixture.

25 I rent fixtures, yes. Well, Paramount

10:48:51AM



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1 rents fixtures.

2 Q. Going back to Exhibit 1023, the unit,  
3 is that what would be shown in, say, the  
4 left-hand portion of the photograph here?

5 A. Yes. You had to rent all of that.

10:49:06AM

6 Q. So the stand and the framing, et  
7 cetera?

8 A. Not the stand. The stand would not be  
9 part of it. Just the frame, what is called the  
10 bail that goes into the stand, and then you would  
11 have cables coming off the back.

10:49:18AM

12 If you look on the ground, there's a  
13 bunch of parts and pieces. Part of that is the  
14 power supply because the power supply was not in  
15 the unit.

10:49:30AM

16 If you look at the unit, there's not  
17 like a lot of room for a power supply. It's  
18 basically just all the lights. So the power  
19 supply has to be external from the unit, which  
20 then plugged into something that had an AC  
21 adapter or -- I don't know, it could be a 220.  
22 It had an AC adapter and then a plug in.

10:49:40AM

23 Q. And so this is -- "this" being the  
24 MacTech LED tube fixture -- this is something  
25 that Paramount has rented in the past?

10:50:01AM



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1 A. Yes.

2 Q. Is it currently offered at Paramount?

3 A. If somebody requests it, yes.

4 Q. Do you keep them in stock?

5 A. No.

10:50:13AM

6 Q. So how do you get them if somebody  
7 requested them?

8 A. I rent them from Universal.

9 Q. What other LED tubes other than the  
10 Colt Bi-Color LED tubes, are available for rent  
11 at Paramount?

10:50:32AM

12 A. Today?

13 Q. Today, right.

14 A. Astera has made an LED tube that is  
15 very popular currently. A-S-T-E-R-A.

10:50:48AM

16 They came out sometime -- my first  
17 dealing with them would have been right -- a  
18 little before Covid, 2019 or so. They are now  
19 very popular. They have several colors. Their  
20 tube is different.

10:51:28AM

21 MR. WARD: Let's go off the record.  
22 (Break taken.)

23 BY MR. WARD:

24 Q. Bruce, you said that the Astera tube  
25 comes in several colors?

11:02:25AM



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1           A.    Yes.  Well, it has several colors  
2    within it.  It can become any color.

3           Q.    Oh.  So does that include a daylight  
4    color and a tungsten color?

5           A.    It is not the same, but yes.  You can  
6    come up with some variation of it.  I don't know  
7    exactly how they are made because I've never seen  
8    the LEDs because they have a cover over them that  
9    you can't see through.

11:02:43AM

10                So somehow or another it uses the color  
11    spectrum to generate any color but it does not --  
12    comparatively to specifically the Colt tube, it  
13    does not make as good of a daylight or tungsten  
14    color because it's not specific if you're  
15    mixing -- it's a mix of different colors to get  
16    that, versus being one color.

11:03:01AM

17           Q.    So you said the Astera tubes are  
18    different.  How else are they different?

11:03:21AM

19           A.    You can run them off an iPad.  They  
20    have no -- they do not have like the ends on the  
21    batteries or the ends on the things to plug them  
22    in.  They are only battery-operated.

11:03:43AM

23           Q.    But you said that they are a popular  
24    LED tube option?

25                MR. HOFFMAN:  Objection to the

11:04:06AM



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1     characterization, form.

2                 THE WITNESS: Today they are, for what  
3     they get used for.

4     BY MR. WARD:

5             Q.     And what is that, Bruce?

11:04:14AM

6             A.     Well, I'm not on set so I don't really  
7     know. But they are going to use them because  
8     they are very, very expensive, significantly more  
9     than -- they are very expensive as a kit.

10            So they are going to use them more on  
11   specialty needs where it fits. For example, if  
12   you are making a strip club, it can do any color,  
13   if you are doing some sort of bar or whatever.  
14   Any color that you want, versus a bi-color tube  
15   which can only do daylight and/or tungsten. And  
16   now it's evolved to something between the color  
17   wheel.

11:04:37AM

18            Q.     What other LED tubes are available?

19                 You mentioned MacTech LED tubes are  
20   available, Astera tubes are available, the Colt  
21   Bi-Color LED tubes. Any others?

11:05:04AM

22            A.     Currently Cineo makes a tube but I have  
23   never rented it.

24            Q.     How do you spell that, Bruce?

25            A.     I believe it is C-I-N-E-O. It's

11:05:19AM



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1 another company that Universal has bought to do  
2 over the MacTechs.

3 Q. And are those in stock at Paramount?

4 A. No.

5 Q. But if someone requested it, you could  
6 rent the Cineo LED tube?

11:05:49AM

7 A. Yes.

8 Q. And how does it work in that instance,  
9 Bruce, for Paramount? Do you purchase the  
10 product and then rent it to the customer, or are  
11 you renting from someone else and then also  
12 renting to your customer?

11:06:01AM

13 A. Both.

14 Q. So if I requested a Cineo LED tube, you  
15 might purchase it and rent it to me. You might  
16 also rent it from another company and then rent  
17 it to me?

11:06:19AM

18 A. I would rent it from Universal,  
19 specifically. I believe they are the only ones  
20 who own it.

11:06:29AM

21 Q. Any other LED tubes available  
22 currently?

23 A. I know people own the Quasar tubes.

24 Q. And what do you mean by that?

25 A. The Quasar tubes are out there that

11:06:54AM



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1 people are renting and using.

2 Q. Are they available at Paramount?

3 A. We don't own any.

4 Q. But if a customer requested a Quasar  
5 LED tube, you could provide it to them?

11:07:12AM

6 A. That would be dependent upon other  
7 people. But yes, if they asked for it.

8 Q. Similar to a Cineo tube where you might  
9 have to go out and get it, you would have to  
10 arrange to acquire the Quasar LED tube to provide  
11 it to a customer if they requested it?

11:07:30AM

12 MR. HOFFMAN: Objection, foundation,  
13 form.

14 THE WITNESS: Yes.

15 BY MR. WARD:

09:48:00AM

16 Q. And you have not rented a Quasar  
17 Science LED tube, correct?

18 A. Not in many years.

19 Q. When did you rent one?

20 A. Again, the date's going to go back, I  
21 don't know, 2013, 2014, around there, back then.

11:07:58AM

22 Q. Do you remember the project that you  
23 rented them for?

24 A. I do not.

25 Q. Do you recall who it was that requested

11:08:15AM



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1     them?

2           A.     I do not. But he did own them. That's  
3     all I remember is that he owned them. Whoever it  
4     was, they owned them. I didn't actually have to  
5     go out and rent them.

11:08:37AM

6           Q.     Did you charge them to use them at  
7     Paramount?

8           A.     Yes.

9           Q.     So a customer that was shooting at  
10    Paramount Pictures came with the Quasar Science  
11    LED tubes, correct?

11:08:49AM

12          A.     Correct.

13          Q.     And you charged them to use those LED  
14    tubes while at Paramount?

15          A.     We charged a buyout.

11:09:01AM

16          Q.     I'm sorry, you charged what?

17          A.     A buyout. We charged them money to use  
18    the equipment owned by the gaffer or by the crew.

19          Q.     And is that true with all equipment  
20    used on a set or just the lighting?

11:09:19AM

21          A.     It's generally based production to  
22    production, not the -- and it has currently  
23    evolved from what it was. We used to do more  
24    buyouts. Now we charge -- we make our own deal  
25    with the crew member that owns it because again,

11:09:37AM



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1 we can only rent from certain people so we can't  
2 always do that.

3 Sometimes we have to let production do  
4 it and then we charge a buyout. Sometimes we can  
5 get them in as a customer because our entity  
6 company does not want many vendors. They are  
7 trying to decrease the number of vendors that we  
8 can rent from. And that is from the Paramount  
9 whole, global perspective.

11:09:51AM

10 Q. I'm just trying to get a sense, Bruce,  
11 of the current market for LED tubes.

11:10:15AM

12 You mentioned Colt's Bi-Color LED  
13 tubes, MacTech LED tubes, Astera LED tube, Cineo  
14 LED tube and Quasar Science LED tube.

15 Any others that you are aware of,  
16 currently?

11:10:35AM

17 A. Not including workshop lights, that is  
18 all I can think of. There may be more, I don't  
19 know. People are making so many things now it's  
20 impossible to keep track. The technology is  
21 moving very fast. So those are the ones that I  
22 -- I mean honestly, the only ones I'm currently  
23 running are Colt and Astera.

11:10:50AM

24 Q. What do you mean by workshop lights?

25 A. Things that you would buy at Home Depot

11:11:10AM



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1 that don't matter for -- they are not worried  
2 about the color and how accurate there are. I  
3 know there are a bunch of those. If you go to  
4 Home Depot, you can find 500 different types of  
5 those.

11:11:21AM

6 Q. Did you say currently you are only  
7 renting Astera LED tubes and Colt LED tubes,  
8 correct?

9 A. Correct.

10 Q. And what percentage would you say of  
11 your rentals are the Astera LED tubes?

11:11:30AM

12 A. To the number of actual tubes, very  
13 small. Way less than 10.

14 Q. As far as the number of sets, how many  
15 sets are using Astera tubes versus sets that are  
16 using the Colt tubes?

11:11:52AM

17 A. Sets or productions?

18 Q. Productions.

19 (Discussion held off the record.)

20 BY MR. WARD:

09:48:00AM

21 Q. I'm going to restate the question.  
22 What percentage of your rentals to  
23 productions use the Astera LED tubes, Bruce?

24 A. What percentage of productions use  
25 Astera LED tubes? We currently don't have many

11:13:14AM



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1 productions. I believe all but one. So we only  
2 have six productions currently. So all but one  
3 has some form of Astera tube on it.

4 So that would be what? About 83  
5 percent, 84 percent.

11:13:43AM

6 Q. How many productions are currently  
7 using Colt Bi-Color LED tubes?

8 A. The same; five of the six.

9 Q. So there are productions that rent both  
10 the Astera tube and the Colt tube?

11:14:06AM

11 A. All of the productions who have Astera  
12 tubes have Colt tubes. The one production is the  
13 same production that has neither.

14 Q. And which production is that?

15 A. It's called After Midnight. It's a  
16 late night talk show.

11:14:27AM

17 Q. And so can you provide a total number  
18 of Astera tubes being rented by After Midnight?

19 A. Zero.

20 Q. The total number of Colt Bi-Color LED  
21 tubes being rented by After Midnight?

11:14:44AM

22 A. Zero.

23 Q. And you said for the productions that  
24 are renting tubes, what's the average number of  
25 Astera tubes that are rented by those

11:15:04AM



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1 productions?

2 A. This is a guesstimate. I would say I  
3 have one production that has several. I'd say  
4 30, 32.

5 Q. And how many Colt Bi-Color LED tubes on  
6 average were rented?

11:15:24AM

7 A. Let's go 300.

8 Q. You said there's a cost difference.

9 What's the cost of a single Astera

10 tube?

11:15:39AM

11 A. They do not rent as a single tube, they  
12 only rent as a kit of eight. So depending on the  
13 length of the tube, it is four. But it's eight  
14 and that rental price is around 750.

15 Q. \$750?

11:15:55AM

16 A. For eight lights, correct.

17 Q. For what time period?

18 A. A week.

19 Q. And what's the price for eight Colt

20 Bi-Color LED tubes per week?

11:16:09AM

21 A. It changes per the production. Every  
22 production has a different rate that it goes at.  
23 The Astera tubes are priced as a premium.

24 The Colt, they go out based on whatever  
25 the production is. So they can go as low as \$10

11:16:29AM



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1 a tube for a long term to \$20 a tube for a short  
2 term per tube, currently.

3 Q. And that would be in comparison, just  
4 doing the quick math, \$750 a week for eight tubes  
5 for the Astera is roughly \$93 a week per tube,  
6 correct?

11:16:52AM

7 A. Per eight. Yes, sure.

8 Q. So I'm just trying to compare apples to  
9 apples. That would be \$93, roughly, per week for  
10 the Astera verse 10 to \$20 a week for the Colt  
11 tube, correct?

11:17:13AM

12 A. Correct.

13 MR. WARD: Bruce, I want to move now to  
14 your declaration. I'm going to go ahead and  
15 share it on the screen.

11:17:24AM

16 THE WITNESS: (Perusing.)

17 MR. WARD: I'm sharing now what's  
18 marked as Exhibit 2067, an IPR 2023-613. It's  
19 labeled: "Declaration of Bruce Wonderlick in  
20 Support of Patent Owner's Response."

11:17:44AM

21 BY MR. WARD:

22 Q. Do you see that, Bruce?

23 A. Barely. Can you expand it a little  
24 more?

25 Q. Sure.

11:17:52AM



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1 A. That's perfect. Thank you. Yes.

2 Q. Do you recognize this document, Bruce?

3 A. I do.

4 Q. Who prepared this declaration?

5 A. Mr. Hoffman wrote it and put it in an  
6 e-mail.

11:18:06AM

7 Q. I'm sorry, you said he put it on the  
8 e-mail?

9 A. He's the one who typed it up.

10 Q. And did you provide comment on the  
11 declaration?

11:18:21AM

12 A. Yes.

13 Q. How did you provide comment?

14 A. Conversation on the phone, providing  
15 some written stuff. I remember writing it a long  
16 time ago. Most recently the redo of this, we had  
17 a conversation and he sent me the old one and I  
18 made some changes to it as far as some updating.

11:18:36AM

19 And then we went over it a couple of  
20 times and I made some more changes, a couple of  
21 revisions. And then he sent it to me, I signed  
22 it, dated it and sent it back.

11:18:58AM

23 Q. When did you first start working with  
24 Mr. Hoffman, Bruce?

25 A. I don't recall; a long time ago.

11:19:13AM



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1 Whenever the first declaration was. I couldn't  
2 tell you when that was.

3 Q. And what was that? Was that  
4 declaration for one of these proceedings, Bruce?

5 A. Yeah, it was for this, yes. It was  
6 this declaration, just revised, assuming this is  
7 the revised one.

11:19:26AM

8 Q. So you've only ever worked with  
9 Mr. Hoffman on one declaration, correct?

10 A. And then the revision.

11:19:46AM

11 Q. Did you start working with Mr. Hoffman  
12 more than a year ago?

13 A. Yes.

14 Q. Did you start working with Mr. Hoffman  
15 more than two years ago?

11:20:04AM

16 A. Yes.

17 Q. But you don't recall a particular date?

18 A. I do not recall the date of the  
19 original declaration that I did. It was a long  
20 time ago.

11:20:17AM

21 Q. Was it more than ten years ago?

22 A. That, I can't say. I would definitely  
23 say more than seven.

24 Q. So prior to the pandemic?

25 A. Prior to the pandemic. At least that's

11:20:36AM



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1 my memory. I could be wrong but that's the time  
2 my memory says, yes.

3 Q. What was the initial request that was  
4 made to you by Mr. Hoffman?

5 MR. HOFFMAN: Objection, form.

11:20:51AM

6 THE WITNESS: I was asked what do I  
7 know about the Colt tube. Tell me how it works  
8 into the business and then give me what I know  
9 about it from a rental perspective.

10 BY MR. WARD:

09:48:00AM

11 Q. How long after you first began speaking  
12 to Mr. Hoffman was a draft declaration created?

13 A. I don't know.

14 THE WITNESS: I'm going to cancel this  
15 phone call on my phone.

11:21:29AM

16 MR. WARD: Feel free to take it, Bruce.

17 THE WITNESS: I can call them right  
18 back after we're done.

19 BY MR. WARD:

20 Q. More than seven years ago you began  
21 this discussion with Mr. Hoffman, correct?

11:21:46AM

22 MR. HOFFMAN: Objection, foundation.

23 THE WITNESS: That is my guess, yes.

24 BY MR. WARD:

25 Q. And as part of those discussions, you

11:21:59AM



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1 were asked to assist in developing a declaration,  
2 correct?

3 A. Correct. I was asked if I would do it,  
4 I wasn't asked to do it. I was asked if I would  
5 be willing to do it.

11:22:14AM

6 Q. And what was your answer, Bruce?

7 A. Yes.

8 Q. And what, specifically, were you told  
9 you were going to be asked to testify about?

10 MR. HOFFMAN: Objection, form,  
11 foundation.

11:22:29AM

12 THE WITNESS: I wasn't told I would be  
13 asked about anything. I'm surprised I'm in this,  
14 to be honest.

15 BY MR. WARD:

09:48:00AM

16 Q. Why are you surprised you are in this,  
17 Bruce?

18 A. I have never done this before so I've  
19 never had to do a declaration for anybody or be a  
20 part of a lawsuit for anybody.

11:22:50AM

21 Q. Understood.

22 The question that was initially asked  
23 of you was whether you would provide testimony  
24 regarding Colt's products, correct?

25 MR. HOFFMAN: Objection, foundation.

11:23:07AM



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1 THE WITNESS: Not worded that way, but  
2 yes.

3 BY MR. WARD:

4 Q. Were you ever asked about anything  
5 other than the Colt Bi-Color LED tube?

11:23:14AM

6 A. Only if it was the first of the type,  
7 if it was the first bi-color to be out there in  
8 the market, and I believe I was asked that.

9 I don't know that. I can't even  
10 recall.

11:23:37AM

11 Q. Over the multiyear period in which you  
12 interacted with Mr. Hoffman, how many total  
13 conversations did you have with him?

14 A. I've probably had five, maybe six  
15 actual phone conversations.

11:23:54AM

16 Q. Have you met with Mr. Hoffman in  
17 person?

18 A. Excuse me?

19 Q. Have you met with Mr. Hoffman in  
20 person?

11:24:03AM

21 A. No. This morning was the first time  
22 I've ever seen what he looked like.

23 Q. Now you know just how dang good-looking  
24 he is, huh?

25 So you spent the multiyear period in

11:24:17AM



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1 those conversations with Mr. Hoffman working on  
2 this declaration?

3 MR. HOFFMAN: Objection,  
4 mischaracterization, form, foundation.

5 THE WITNESS: Definitely not multiyear.  
6 We talked when we did the original and I haven't  
7 talked to him since until this came back up and  
8 he had me re-go through it. In between there was  
9 not a single communication.

11:24:29AM

10 BY MR. WARD:

09:48:00AM

11 Q. You would agree that many years passed  
12 between the first conversation and the most  
13 recent conversation, correct?

14 A. Correct.

15 Q. So there were many years in which you  
16 did not converse with Mr. Hoffman, correct?

11:24:57AM

17 A. Correct.

18 Q. Did you have conversations with anyone  
19 else from Colt?

20 MR. HOFFMAN: Object to the form.

11:25:16AM

21 THE WITNESS: About this or about what?

22 BY MR. WARD:

23 Q. About anything?

24 A. I talk to them when I need to acquire  
25 tubes from them.

11:25:28AM



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1 Q. And who is it that you talk to, Bruce?

2 A. Often the person I usually use for  
3 rentals is one of the -- Sarah.

4 Q. What's Sarah's last name, do you know?

5 A. Field.

11:25:47AM

6 Q. And what's Sarah's position, Bruce?

7 A. I don't know what her title is. I use  
8 her for rentals.

9 Q. But you are purchasing equipment from  
10 Colt or are you renting equipment?

11:26:02AM

11 A. I rent equipment.

12 Q. So Paramount does not own any Colt  
13 Bi-Color LED tubes?

14 A. We own several bi-color LED tubes. We  
15 don't have enough of them. And since we bought  
16 our original batch, they have made more versions  
17 of them.

11:26:14AM

18 Q. Have you purchased any since you bought  
19 the original batch?

20 A. Yes, but it has been a long time since  
21 we have purchased them.

11:26:31AM

22 Q. And why are you no longer purchasing  
23 them?

24 A. You would have to ask corporate that.  
25 They determine where our dollars go.

11:26:44AM



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1 Q. Have you had any conversations with  
2 Colt employees or affiliates about your testimony  
3 for these proceedings?

4 A. No.

5 Q. Have you had any conversations with  
6 anyone other than Mr. Hoffman?

11:26:58AM

7 A. No.

8 Q. Did you speak to Mr. Silva about your  
9 declaration?

10 A. No. He knows I did it and I know he  
11 did it but that's it.

11:27:13AM

12 Q. How is it that he knows you did it?

13 A. He told me that he did it and I said  
14 they asked me too.

15 Q. So you did have a conversation?

11:27:24AM

16 A. He took off work yesterday. I know he  
17 took off work yesterday to do this because he  
18 wasn't there. But yes.

19 Q. So you did have a conversation with  
20 Mr. Silva about your testimony?

11:27:36AM

21 MR. HOFFMAN: Objection, form,  
22 foundation, mischaracterization.

23 THE WITNESS: I would say no, we have  
24 not talked anything about what we are actually  
25 talking about. That it exists, sure.

11:27:46AM



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1 BY MR. WARD:

2 Q. And how many of those conversations did  
3 you have, Bruce?

4 A. Probably one. I don't remember if we  
5 ever talked about it seven-plus whatever years  
6 ago it was. But I don't remember ever talking  
7 about it then. There is no reason for me to talk  
8 to him about it. We have different aspects with  
9 Colt.

11:28:01AM

10 Q. Bruce, I'm showing on the screen now  
11 the second page of your declaration,  
12 Exhibit 2067, and I want to direct your attention  
13 to paragraph two which says: "I oversee  
14 stocking, ordering and providing set lighting  
15 equipment for all productions for which Paramount  
16 provides lighting equipment on the Paramount lot  
17 and elsewhere."

11:28:19AM

18 A. Okay.

19 Q. In your position you mentioned  
20 previously that you rent lighting equipment,  
21 ladders and carts, correct?

11:28:34AM

22 A. Correct.

23 Q. Does your department rent anything  
24 else?

11:28:51AM

25 A. Lighting equipment.

11:29:09AM



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1 Q. So three things that you previously  
2 mentioned, lighting equipment, ladders, human  
3 ladders and carts or moving equipment.

4 Anything else?

5 A. In my particular department, not that I  
6 can think of.

11:29:24AM

7 Q. I'm aware of the expendables  
8 department. What other departments are there at  
9 Paramount for providing materials and/or  
10 services?

11:29:43AM

11 A. Within the whole studio or within the  
12 set lighting department?

13 Q. Within the whole studio.

14 A. We have a grip department, we have a  
15 transportation department, we have a sign shop.  
16 We have a paint shop. We have a wood molding  
17 shop.

11:29:51AM

18 I believe now that is currently all of  
19 them. We used to have several more but they have  
20 removed them over the years.

11:30:14AM

21 Q. Bruce, you say that you oversee  
22 stocking, ordering and providing set lighting  
23 equipment for all productions for which Paramount  
24 provides lighting equipment on the Paramount lot  
25 and elsewhere.

11:30:31AM



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1                   What do you mean by elsewhere?

2           A.     Elsewhere, they go on location. Like  
3 currently I have a show and they are at Calamigos  
4 Ranch which is up in Malibu.

5                   In between phone calls we are picking  
6 up stuff and then currently I had to -- while we  
7 had our break I called to make sure everything  
8 was going okay.

11:30:43AM

9                   Within the productions on the lot,  
10 anyone who comes onto the lot has to get our  
11 equipment for any other off-lot locations.

11:30:54AM

12           Q.     So it's required for any production  
13 using Paramount, whether they are at Paramount or  
14 even located off site, that they rent equipment  
15 from you?

11:31:16AM

16           A.     Well, if that's what the contract says  
17 with the production. But with the productions  
18 that rent stages from us as a whole production,  
19 that is the normal.

20           Q.     So you mentioned earlier that it's  
21 possible for a group to bring their own lighting  
22 equipment to Paramount, correct?

11:31:35AM

23           A.     Correct.

24           Q.     But those individuals are required to  
25 pay Paramount for using those lights at

11:31:51AM



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1 Paramount?

2 A. The individuals are not. The  
3 productions are.

4 Q. So the productions have two options  
5 with respect to lighting equipment; they can  
6 bring their own and pay Paramount for the ability  
7 to do that or they can rent lighting equipment  
8 from you, correct?

11:32:05AM

9 A. No. They do not get the options. We  
10 determine if they have that options.

11:32:17AM

11 Q. You determine whether or not they can  
12 bring their own equipment?

13 A. Correct.

14 Q. And is that based upon whether or not  
15 they are going to pay you enough to bring it?

11:32:27AM

16 A. That is based on the size of the  
17 production and the length of the production.

18 Q. When do you agree for them to use their  
19 own equipment and when do you not agree,  
20 generally?

11:32:42AM

21 A. Generally only on short-term  
22 productions, like a commercial, or something that  
23 is coming to the lot to, say, use a stage or one  
24 of our lot locations who shoot at another  
25 location generally.

11:32:55AM



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1 For example, if a show from Disney  
2 wants to come use our lot, we will often give  
3 them a buyout for their gear or based on a dollar  
4 spend. But that is a contract that's done by the  
5 sourcing people, the client services group who  
6 does the contract to get them on the lot.

11:33:16AM

7 Q. Do you, in the Paramount set lighting  
8 rental department, currently offer any bi-color  
9 LED tubes other than Colt Bi-Color LED tube?

10 A. No.

11:33:41AM

11 Q. The only option available to someone, a  
12 customer coming to Paramount for a bi-color LED  
13 tube, is to rent the Colt product?

14 MR. HOFFMAN: Objection,  
15 mischaracterization, asked and answered.

11:33:53AM

16 THE WITNESS: No.

17 BY MR. WARD:

18 Q. What other option is available, Bruce?

19 A. Whatever they request.

20 Q. I thought you said earlier that you  
21 only rent the Colt Bi-Color LED tube?

11:34:08AM

22 A. If you are talking about renting as far  
23 as we own, I have told you that we also rent the  
24 Astera tubes. But we rent whatever the customer  
25 requests, if the production approves it.

11:34:23AM



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1 Q. Are you currently renting any LED tubes  
2 other than the Astera LED tube and the Colt  
3 Bi-Color LED tube?

4 A. No.

5 Q. Bruce, I want to move to paragraph five  
6 of your declaration. I'm sharing it onscreen  
7 now.

11:34:59AM

8 Paragraph five you say: "I am familiar  
9 with Guillermo Macias' Memo of Colt LED and the  
10 bi-color lighting device of the type shown is US  
11 Patent Numbers" --

11:35:12AM

12 (Reporter clarification.)

13 Q. I'll start with paragraph five again.

14 In paragraph five you state: "I'm  
15 familiar with Guillermo Macias' Memo of Colt LED  
16 and the bi-color lighting device of the type  
17 shown in his U.S. patent numbers 10,411,582 and  
18 10,566,895, the Colt patents.

11:35:39AM

19 "I refer to the invention in these two  
20 patents as Memos bi-color LED tube invention and  
21 I refer to Colt's Bi-Color LED tube light product  
22 itself as Colt's Bi-Color LED tube."

11:36:07AM

23 Bruce, did you review the 582 and the  
24 895 patents?

25 A. I have.

11:36:27AM



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1 Q. And you state: "I refer to the  
2 invention in these two patents as Memos bi-color  
3 LED tube invention."

4 What do you understand that invention  
5 to be, Bruce?

11:36:40AM

6 A. The format T-12 bi-color LED tube with  
7 a high CRI and a good color correction,  
8 switchable LED tube.

9 Q. Bruce, when did you first meet  
10 Mr. Macias?

11:37:20AM

11 A. I honestly don't know. Sometime in  
12 that -- whenever this period all happened. He  
13 came out of nowhere. I don't even know where he  
14 came from.

15 Q. Do you recall being introduced to  
16 Mr. Macias?

11:37:34AM

17 A. Our actual introduction, no.

18 Q. Did you know Mr. Macias was a clothing  
19 provider through Colt's International Clothing?

20 MR. HOFFMAN: Objection, foundation.

11:37:52AM

21 THE WITNESS: Not until I actually saw  
22 the actual legal company name.

23 BY MR. WARD:

24 Q. So you didn't know that Mr. Macias was  
25 a clothing provider?

11:38:11AM



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1 A. No.

2 MR. HOFFMAN: Objection, foundation,  
3 mischaracterization.

4 BY MR. WARD:

5 Q. Did you know Mr. Macias to be a  
6 lighting expert?

11:38:22AM

7 A. No, I did not.

8 MR. HOFFMAN: Objection, foundation.

9 BY MR. WARD:

10 Q. Do you recall meeting Mr. Macias before  
11 you had seen the Colt's Bi-Color LED tube?

11:38:31AM

12 A. I don't but it's very likely that I  
13 did.

14 Q. And why do you say it's very likely,  
15 Bruce?

11:38:52AM

16 A. Because I would imagine at some point I  
17 met him. I can't recall the timeframe of what  
18 happened when. But I would assume he'd built up  
19 some sort of relationship before the product was  
20 here.

11:39:23AM

21 Q. Do you recall seeing Mr. Macias at  
22 Paramount?

23 A. Yes, I have seen him at Paramount.

24 Q. Do you recall the first time that you  
25 saw him at Paramount?

11:39:37AM



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1 A. I do not.

2 MR. HOFFMAN: Objection, asked and  
3 answered.

4 BY MR. WARD:

5 Q. When have you seen him at Paramount,  
6 Bruce?

11:39:44AM

7 A. Over the years, several times. I have  
8 not seen him in many years but I just know the  
9 first time I saw him was a long time ago. But  
10 it's probably been at least pre-Covid since the  
11 last time I saw him.

11:40:02AM

12 Q. When was the first time you saw a Colt  
13 Bi-Color LED tube?

14 A. I don't remember the actual year or  
15 time.

11:40:21AM

16 Q. Do you recall seeing the bi-color LED  
17 tube?

18 A. I do.

19 Q. Do you recall seeing the tube at  
20 Paramount first?

11:40:36AM

21 A. I do. And actually, as I recall, I can  
22 tell you for sure I met him before the tube was  
23 out because he had a version -- his first version  
24 actually wasn't good, good enough to be  
25 picture-worthy, and then he came back with it.

11:40:53AM



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1                   So I definitely met him before the  
2 final product came out.

3           Q.    So you remember Mr. Macias coming to  
4 Paramount to show you a prototype, correct?

5           A.    Yes. He wasn't necessarily coming to  
6 show me but I saw it.

11:41:05AM

7           Q.    Who was he coming to show, Bruce?

8                   MR. HOFFMAN: Objection, foundation.

9                   THE WITNESS: He was showing different  
10 lighting people.

11:41:17AM

11 BY MR. WARD:

12           Q.    And who were those different lighting  
13 people?

14           A.    The only guy I know particularly, I  
15 know Fernando was there. And I know a guy, Todd  
16 Csernecky.

11:41:29AM

17           Q.    Are these Paramount employees?

18           A.    Fernando is. Todd is not.

19           Q.    And did you understand that they had  
20 requested to see this product from Mr. Macias?

11:41:46AM

21           A.    I think they offered to look at it,  
22 more than they asked to see it. I think he asked  
23 for help with what they thought. Maybe not, I  
24 don't know. I don't know what they were asked.

25           Q.    And was the first Colt product you saw

11:42:06AM



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1 a bi-color product?

2 A. Yes.

3 Q. And you said that it wasn't sufficient.  
4 Why was it not sufficient?

5 A. If I remember right, the daylight was  
6 perfect. The warm white was a little off.

11:42:19AM

7 Q. And what do you mean by "a little off"?

8 A. When it dimmed, it was a little  
9 bit -- it went -- the color changed. One or the  
10 other. One of them was good and the other one  
11 had a little issue.

11:42:50AM

12 When you dim lights, they change color.  
13 And it was not what you would want, which is what  
14 the MacTech problems were.

15 Q. So when the light was dimmed, would it  
16 continue to oscillate between different colors or  
17 just change to an undesired color?

11:43:12AM

18 A. It would just give off, to the camera,  
19 not that you would see it with your eye  
20 necessarily, but if you meter it, it gave a  
21 slight magenta or -- I'm pretty sure it was the  
22 daylight -- or the tungsten, the warm white, that  
23 gave off a slight magenta to a meter.

11:43:26AM

24 Q. Do you recall these problems being  
25 identified to Mr. Macias?

11:43:48AM



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1           A.    I assume so, yes. I don't necessarily  
2   recall it but I remember there was a problem and  
3   he came back and then he had the finished  
4   product.

5           Q.    How much time passed between when you  
6   saw the first version of the product and when you  
7   saw the second version?

11:44:07AM

8           A.    I don't recall.

9           Q.    Was it more than a month?

10          A.    I would assume so.

11:44:20AM

11          Q.    Was it more than two months?

12          A.    I would assume more than three months  
13   but any more than that I don't know.

14          Q.    And why would you assume more than  
15   three months?

11:44:33AM

16          A.    Because it takes that long to have a  
17   change made and then have it shipped.

18               MR. HOFFMAN: Objection,  
19   mischaracterization.

20   BY MR. WARD:

09:48:00AM

21          Q.    And why does it take three months to  
22   have a change made?

23          A.    That's just how long it takes to make  
24   lighting changes, generally, when people want to  
25   get stuff done and it's made overseas.

11:44:55AM



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1 Q. So you understood that Mr. Macias was  
2 working with overseas manufactures?

3 A. Yes. All LEDs are made overseas.

4 Q. I believe you said all LEDs are made  
5 overseas, correct?

11:45:36AM

6 A. Correct.

7 Q. So you understood Mr. Macias was  
8 working with an overseas LED manufacturer?

9 A. I don't know necessarily they are an  
10 overseas manufacture. That's all they do. But  
11 yes, I know that somebody overseas was making  
12 them. Every LED currently being made is made  
13 overseas.

11:45:48AM

14 Q. So you had estimated that it took three  
15 months or more for Mr. Macias to change his  
16 product because he would have had to work with  
17 his overseas LED manufacturer?

11:46:03AM

18 MR. HOFFMAN: Objection,  
19 mischaracterization, scope.

20 THE WITNESS: Correct, but that's just  
21 an assumption.

11:46:18AM

22 BY MR. WARD:

23 Q. Who did Mr. Macias show the second  
24 product to at Paramount?

25 A. I don't remember.

11:46:32AM



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1 Q. Were you part of the group?

2 A. I don't remember.

3 Q. You don't remember seeing the product  
4 the second time?

5 A. Not before they were rentable. That  
6 being necessarily the first go, no. I don't  
7 remember when I saw it. This was a long time  
8 ago. I see lots of lights that come through.

11:46:41AM

9 Q. So you do recall seeing the first Colt  
10 product that had issues, correct?

11:46:58AM

11 A. In my mind I am recalling that  
12 originally there was a problem, yes.

13 Q. And when was the second time that you  
14 saw a Colt product?

15 A. I don't know the timeframe between. I  
16 don't know remember if it was -- what it was but  
17 obviously I've seen them many times since.

11:47:11AM

18 I don't know the exact time. I just  
19 know at one point then it was fine for people and  
20 productions were renting them.

11:47:23AM

21 Q. After seeing the Colt product that had  
22 issues, the next time you saw the Colt product  
23 you were renting the product?

24 A. I don't recall if I saw -- before I was  
25 renting the product, there was a very good

11:47:38AM



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1     likelihood that I did see it before but I do not  
2     remember.

3             Q.     Do you recall asking how -- let me  
4     restate that.

5                     Do you recall learning that this Colt  
6     product had overcome its initially identified  
7     insufficiencies?

11:47:57AM

8             A.     I know that I remember that at some  
9     point people were then renting the lights.

10                    I am just a provider. I don't care if  
11     the lights look good or not. It does not matter  
12     to me. It's the productions that matter. It's  
13     what they order.

11:48:14AM

14             Q.     So you don't remember learning that the  
15     Colt products overcame its initial problems?

11:48:27AM

16             A.     I don't remember the timeframe. I  
17     remember that it did happen but I don't remember  
18     any timeframe to that.

19             Q.     But you do remember learning that the  
20     Colt product was now working in a way that  
21     overcame the initial problems?

11:48:39AM

22             A.     Yes.

23             Q.     And how would you have learned that,  
24     Bruce?

25             A.     People started renting them or somebody

11:48:51AM



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1 told me. Honestly, I do not remember other than  
2 at some point somebody would have had to say they  
3 liked them, because I would tell you I don't  
4 care. If somebody likes something or if they ask  
5 my opinion about a light, I do not tell them --  
6 it doesn't matter what I think because I don't  
7 rent lights -- or I don't order lights.

11:49:07AM

8 If the Colt light or any other light  
9 has a problem, it does not matter to me. If it's  
10 what the production wants, it's what I have to  
11 supply.

11:49:18AM

12 Q. Bruce, in paragraph six of your  
13 declaration which is on the screen now you say:  
14 "I understand Colt's Bi-Color LED tube has the  
15 features disclosed and claimed in Colt's  
16 patents."

11:49:35AM

17 What are those features?

18 A. It is a bi-color tube that is  
19 switchable with high CRI -- high output,  
20 depending upon -- a much better energy saver than  
21 a florescent tube. There are LED's that are more  
22 energy saving because they push out less -- they  
23 are -- at the time it was the best and brightest  
24 LED tube out there.

11:49:46AM

25 Q. Did the features include a lack of heat

11:50:03AM



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1 issues?

2 A. Yes, there are no heat issues.

3 Q. In paragraph seven you state,  
4 "Generally Colt's Bi-Color tube light is in the  
5 shape of a florescent tube, has LEDs over 90 CRI  
6 and produces tungsten and daylight temperature  
7 light using a switch to select one of these two  
8 types of light."

11:50:21AM

9 Bruce, how did you verify that the Colt  
10 Bi-Color LED tube light provides over 90 CRI?

11:50:43AM

11 A. You have a color spectrum and you can  
12 -- when you check the color, the actual color of  
13 the thing, you have a color spectrum that can  
14 tell you the CRI and the color that it's  
15 producing out.

11:50:58AM

16 We used to have one. I don't know if  
17 we do anymore. But we used to have one on the  
18 lot that we would do that with for things.

19 Because as these products were coming  
20 out, we would have -- what you would get was  
21 people would say it's one thing but it would be  
22 something different when you actually put a color  
23 meter to it.

11:51:12AM

24 Q. Did you personally use a meter to test  
25 the Colt Bi-Color LED tube light for CRI?

11:51:26AM



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1 A. I did not personally use the meter but  
2 I saw the meter being used for it.

3 Q. And who was it that was using the  
4 meter, Bruce?

5 A. I want to say it was Todd Csernecky but  
6 I'm not 100 percent sure on that.

11:51:41AM

7 Q. You go on to say that: "The Colt  
8 Bi-Color tube light has sufficient brightness to  
9 be used as a key light."

10 What's a key light?

11:51:55AM

11 A. It's a light direct on either a talent  
12 or onto a specific thing that you are trying to  
13 promote.

14 Q. And did you, Bruce, personally verify  
15 that the Colt Bi-Color LED tube light has  
16 sufficient brightness to be used as a key light?

11:52:14AM

17 A. I have seen it done many times.

18 Q. And did you personally verify the  
19 sufficient brightness of the Bi-Color LED tube?

20 A. I have seen it compared to the  
21 florescent tube and I have seen it on set.

11:52:28AM

22 Q. You further state that, "The Colt  
23 Bi-Color LED tube light emits an evenly  
24 distributed light from its cover and produces  
25 white light which does not require color

11:52:47AM



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1 compensation gels due to its low level of green  
2 and magenta tones."

3 Have you personally verified the low  
4 level of green and magenta tones for the Colt  
5 Bi-Color tube light?

11:53:02AM

6 A. Yes, that was the problem that he had  
7 on the first tube.

8 Q. And how did you go about testing that  
9 yourself, Bruce?

10 A. It was done on that same color spectrum  
11 test.

11:53:11AM

12 Q. So a meter is used to determine the  
13 level of green and magenta tones?

14 A. Correct.

15 Q. Did you use that meter to test the Colt  
16 Bi-Color tube light?

11:53:25AM

17 A. Again, I did not use the meter. I  
18 believe it was Todd Csernecky but I cannot for  
19 sure say that that's who was actually using it.

20 Q. Paragraph eight, Bruce, you say, "Prior  
21 to Memos bi-color LED tube edition invention,  
22 existing LED lights in the entertainment industry  
23 were of limited use because they generally  
24 contained too much green light and lacked  
25 sufficient brightness."

11:53:40AM

11:53:58AM



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1                   What LED lights were you aware of prior  
2                   to the Colt Bi-Color LED tube?

3           A.    Being used in the business, it would  
4           have been the MacTechs.

5           Q.    Any other LED lights?

11:54:16AM

6           A.    Any LED lights or LED tube lights?

7           Q.    Any other LED lights.

8           A.    There is a company, Litepanels, who  
9           made light panels, one-by-ones and two-inch by  
10          six-inch. Or maybe they are two-by-four. I  
11          don't remember.

11:54:36AM

12          Q.    Do you recall Litepanels LEDs being  
13          used prior to the Colt LED 2?

14          A.    Correct, yes. Those were the first  
15          LEDs I ever saw.

11:54:55AM

16          Q.    Do you remember what time period that  
17          would have been, Bruce?

18          A.    Eagle Eye was the first production I  
19          ever saw use them. So 2006, 2007, 2006 probably.

20          Q.    Do you recall the Litepanels LED light  
21          being a bi-color light?

11:55:14AM

22          A.    It became a bi-color light. Originally  
23          was not but then it became one. Originally it  
24          was daylight or tungsten and then it became a  
25          bi-color.

11:55:28AM



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1 Q. Do you recall any issues with the  
2 levels of green and magenta for the Litepanels  
3 LED?

4 A. Yes, they actually sent gels when you  
5 bought a kit. They actually sold it with gels to  
6 color correct.

11:55:41AM

7 Q. Do you recall any other issues with the  
8 Litepanels LED panels?

9 A. Over time, and it's true with all LEDs  
10 as you can watch with street lights get dimmer  
11 and dimmer, over time they became a lot less  
12 bright.

11:55:58AM

13 Streetlights are getting darker by the  
14 year. Edison sold the city a bill of goods.

15 Q. Were aware of any heat issues for the  
16 Litepanels LEDs?

11:56:22AM

17 A. No.

18 Q. Any other LED light products that you  
19 were aware of prior to Colt other than what  
20 you've mentioned, MacTech and Litepanels?

11:56:37AM

21 A. Not that I can remember.

22 Q. You say in the last sentence of  
23 paragraph eight: "The industry standard in 2013  
24 and for about 25 to 30 years prior to that had  
25 been florescent tube lights," correct?

11:57:01AM



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1 A. Correct.

2 Q. But those products that we just  
3 mentioned, the MacTech product and the Litepanels  
4 product, were available prior to 2013, correct?

5 A. Correct.

11:57:14AM

6 Q. I'm going to move now to paragraph 12  
7 of your declaration.

8 Paragraph 12 says, "Colt's Bi-Color LED  
9 tube was and is a very cost-effective and  
10 desirable alternative to florescent tubes for  
11 several reasons: A, it has sufficient brightness  
12 for use in the set lighting industry yet emits an  
13 even light."

11:57:37AM

14 Bruce, you said earlier that you are  
15 not personally concerned with whether or not a  
16 particular light works correctly, is that right?

11:57:55AM

17 A. Yes.

18 Q. You say here that the Colt Bi-Color LED  
19 tube has sufficient brightness for use in the set  
20 lighting industry.

11:58:17AM

21 How did you verify that?

22 MR. HOFFMAN: Objection, asked and  
23 answered.

24 THE WITNESS: By the amount of rentals  
25 it does.

11:58:23AM



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1 BY MR. WARD:

2 Q. But you haven't verified that by use of  
3 the Colt product yourself, correct?

4 A. I've seen the Colt product compared  
5 against what was the normal, the Kino-Flo, which  
6 was the normal florescent, the mainstream  
7 florescent in the industry.

11:58:32AM

8 And to the eye it was every bit as  
9 bright and the color was right on.

10 Q. And where did you see that, Bruce?

11:58:54AM

11 A. In the warehouse.

12 Q. And where was it set up in the  
13 warehouse?

14 A. We had a table that we used to use for  
15 changing over Kinos because we'd have to change  
16 the lights from daylight to tungsten or whatever  
17 because it's a florescent so each tube had only  
18 one color. So we did it on there.

11:59:08AM

19 And then if I remember right, we turned  
20 off all the lights to make sure we had as little  
21 outside lighting source and then turned them on,  
22 compared the light meters.

11:59:22AM

23 Q. Is that part of your duties in the  
24 rental department, is to test the lights?

25 A. No, but when somebody comes and shows a

11:59:42AM



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1 light, it still happens five to six times a year,  
2 out of respect I will go look at the light and  
3 give them my feedback on what I think, which will  
4 often lead to all I ask about is price.

5 Unless I see something to that  
6 obviously is a negative or a positive, all I care  
7 about is price.

11:59:58AM

8 Q. You go on in paragraph 12 to say that:  
9 "A Colt Bi-Color LED tube has sufficiently high  
10 quality white light (low green/magenta)  
11 regardless of the selected color temperature,  
12 warm or cool, as no gel correction is required."

12:00:18PM

13 How did you personally determine that  
14 the Colt has sufficiently high-quality white  
15 light?

12:00:39PM

16 A. That's the same test that we did for  
17 the magenta and green. It's the same thing; that  
18 there's minimal green and/or magenta as you  
19 switch.

20 Q. And that's the test that you refer to  
21 being conducted by someone else with a meter?

12:00:49PM

22 A. Correct.

23 Q. Is that the same test that you relied  
24 upon in your statement in C there, that the Colt  
25 product has sufficiently high quality of light,

12:01:03PM



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1 high CRI?

2 A. Correct.

3 Q. Bruce, Mr. Silva testified yesterday  
4 that there was a time period when Paramount was  
5 selling the Colt Bi-Color LED tube product.

12:01:23PM

6 Do you recall that time period?

7 A. I do not and I did not know of that  
8 until well after it was happening.

9 But again, I don't do the sales of  
10 them. I don't do any sales.

12:01:36PM

11 Q. When did you first learn that Paramount  
12 had sold Colt Bi-Color LED tubes?

13 A. A long time after they were doing it.  
14 I thought it was all part of my rental inventory.

15 Q. So you were informed that part of that  
16 inventory was actually to sell?

12:02:03PM

17 A. No, I was not informed of that. I  
18 found out that they were being sold.

19 Q. And how did you find that out, Bruce?

20 A. My boss said something when I was doing  
21 the inventory and we didn't have what we should  
22 have had in inventory.

12:02:21PM

23 Q. So you had less than what you thought,  
24 correct?

25 A. Correct.

12:02:33PM



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1 Q. And when you asked your boss, hey, why  
2 do we have less than what we thought, his  
3 response was, "We sold some"?

4 A. Yet, he said talk to Fernando.

5 Q. So Fernando was selling the Colt  
6 Bi-Color LED tubes from his department?

12:02:47PM

7 A. Yes.

8 Q. And in what time period was Fernando  
9 selling the Colt tubes?

10 A. I don't recall but a long time ago. It  
11 would have been in that timeframe from when we  
12 bought them probably for about a year, maybe two.

12:03:02PM

13 Q. You mentioned earlier that initially  
14 you were purchasing the Colt LED tubes, correct?

15 A. Correct.

12:03:24PM

16 Q. So there was about a year period in  
17 which Paramount was buying tubes from Colt?

18 A. There was more. It was longer than  
19 that. I don't know how long but it was longer  
20 than that. We bought different versions in  
21 different lengths.

12:03:37PM

22 Q. Was it more than two years?

23 A. Probably; probably three to four. And  
24 I believe, actually, I believe I'm wrong. I  
25 believe within the last five to six years we made

12:03:55PM



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1 a purchase of eight-foot tubes.

2 Q. Okay. So Paramount first started  
3 providing Colt tubes in 2013, correct?

4 A. Yes.

5 Q. And so for a period of around four  
6 years, so from 2013 to 2017, you were regularly  
7 purchasing Colt LED tubes?

12:04:16PM

8 MR. HOFFMAN: Objection,  
9 characterization, form, foundation.

10 THE WITNESS: Regularly, I would say  
11 no. We have a capital purchase that happens  
12 basically one time a year and we may have a few  
13 one-offs where we buy a few tubes, where we  
14 bought a few tubes, but I would guess not  
15 regularly.

12:04:30PM

16 Most of these purchases that we do with  
17 them are all capital purchases.

18 BY MR. WARD:

19 Q. Were you renting Colt LED tubes during  
20 the 2013 to '14 period from Colt?

12:04:54PM

21 A. Yes.

22 Q. You were both purchasing them and  
23 renting them?

24 A. Correct.

25 Q. And it's during this time period that

12:05:09PM



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1 you understand Mr. Silva was selling the Colt  
2 tubes from Paramount?

3 A. Sometime in there, yes.

4 Q. And why did Mr. Silva stop selling the  
5 Colt tubes?

12:05:27PM

6 MR. HOFFMAN: Objection, foundation.

7 THE WITNESS: He was instructed not to.

8 BY MR. WARD:

9 Q. And who instructed him?

10 A. My boss.

12:05:40PM

11 Q. Which was who at the time?

12 A. Carl Distefano.

13 Q. And why did Mr. Distefano instruct him  
14 not to sell the tubes?

15 MR. HOFFMAN: Objection, form,  
16 foundation.

12:05:51PM

17 THE WITNESS: I don't know the exact  
18 reason.

19 BY MR. WARD:

20 Q. Do you sell other lighting products  
21 from Paramount?

12:06:07PM

22 A. No.

23 Q. Are you aware of any lighting products  
24 being sold by Paramount other than the Colt  
25 tubes?

12:06:23PM



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1 A. As one-offs, yes.

2 Q. But you are not aware of Paramount  
3 being in the business of selling lighting  
4 products, correct?

5 A. Well, we sell florescent tubes. For  
6 years we sold florescent tubes. We are in the  
7 business of -- which is why Fernando probably  
8 thought it was okay to sell LED tubes.

12:06:45PM

9 So there are things that are gray  
10 areas, very few things.

12:07:04PM

11 But in general, no, we are not in the  
12 business of selling our rental equipment.

13 Q. My understanding that Mr. Silva sells  
14 tubes, i.e., the bulb for a replacement but not  
15 the fixture, correct?

12:07:22PM

16 MR. HOFFMAN: Objection, form,  
17 foundation.

18 THE WITNESS: Your question doesn't  
19 really make sense.

20 BY MR. WARD:

09:48:00AM

21 Q. The expendables department sells light  
22 bulbs, correct?

23 A. Correct.

24 Q. Does it also sell florescent tubes?

25 A. Yes.

12:07:45PM



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1 Q. Does it sell lighting fixtures, as in  
2 the hardware for a light?

3 A. Generally no, but on occasion they  
4 have.

5 Q. And in addition to the occasion of  
6 selling Colt Bi-Color LED tubes, what other  
7 occasions are you aware of where Paramount sold  
8 lights?

12:08:00PM

9 A. We have sold lights that have become  
10 obsolete. There have been many deals made by  
11 many people to get lights out of our system.

12:08:16PM

12 Q. Bruce, I want to read to you the  
13 definition of a person of ordinary skill in the  
14 art that the petitioner, Quasar Science, has  
15 given for these particular proceedings.

12:08:44PM

16 I'm going to read that to you and the  
17 definition that the petitioner proposes is that:  
18 "A person of ordinary skill in the art would have  
19 had at least a Bachelor of Science degree in  
20 electrical engineering or a closely-related field  
21 and two or more years of experience in the design  
22 of entertainment lighting systems along with the  
23 design and use of LED lights."

12:09:00PM

24 Bruce, do you consider yourself to be a  
25 person of ordinary skill in the art in accordance

12:09:15PM



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1 with that definition?

2 MR. HOFFMAN: Objection, foundation,  
3 form, scope.

4 THE WITNESS: In that definition, no.

5 BY MR. WARD:

09:48:00AM

6 Q. The patent owner provides this  
7 definition for a person of ordinary skill in the  
8 art.

9 The patent owner says, "A person of  
10 ordinary skill in the art would have had two to  
11 for years of experience in the electrical  
12 engineering/design of film and television  
13 lighting systems, including the design and use of  
14 LED lights combined with two to three years of  
15 work experience as a set lighting technician in  
16 television and/or motion picture industry."

12:09:34PM

17 Bruce, do you consider yourself a  
18 person of ordinary skill in the art in accordance  
19 with the patent owner's definition?

12:09:48PM

20 MR. HOFFMAN: Objection, foundation,  
21 scope.

12:10:02PM

22 THE WITNESS: Other than the use part,  
23 yes.

24 BY MR. WARD:

25 Q. So can you describe to me your two to

12:10:10PM



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1 four years experience in electrical engineering  
2 design of film and television lighting?

3 A. When I was working on shows, the design  
4 is -- every set that we do is the design of an  
5 LED, which is what they are referring to, because  
6 all those definitions are garbage.

12:10:24PM

7 Ask Steve Wozniak and Steve Jobs. They  
8 did just fine without having all those degrees  
9 prior to going into things. But you don't need  
10 that to be an expert in anything.

12:10:46PM

11 But I would constantly be a part of --  
12 when it comes to events, which I did well after,  
13 you would do events and you would have to light  
14 them and we would do that for many years. And  
15 shows for years, prior to me going into the  
16 office in the position that I currently have in  
17 '99.

12:11:02PM

18 So from '95 to '99, all I did was work  
19 on film sets.

20 Q. Bruce, have you been involved in  
21 designing an LED device itself?

12:11:17PM

22 A. No.

23 Q. So you have no experience in designing  
24 the hardware for an LED light, correct?

25 A. No.

12:11:30PM



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1 MR. WARD: Okay, let's go off the  
2 record.

3 (Break taken.)

4 MR. WARD: I have no further questions  
5 for the witness.

12:20:57PM

6 MR. HOFFMAN: I have some redirect.  
7 I'd like to take a five to ten-minute break and  
8 then come back on the record. It's 12:21. About  
9 12:30, 12:31?

10 MR. WARD: Okay.

12:21:12PM

11 (Break taken.)

12

13 EXAMINATION

14 BY MR. HOFFMAN:

15 Q. Mr. Wonderlick, I have a few questions  
16 for you. In your declaration in paragraph 14, I  
17 believe it's lines one and two, you refer  
18 to -- well, it says: "Due to the features and  
19 benefits of Colt's Bi-Color LED tube, especially  
20 13-A to E above."

12:28:44PM

21 Is the 13-A to E above a correct  
22 reference?

23 A. No. It should actually be 12-A to E.

24 Q. In 2013, when Paramount first rented  
25 Colt Bi-Color products, did productions come in

12:29:05PM

12:29:31PM



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1 and ask for any lighting products by name?

2 MR. WARD: Objection, foundation.

3 THE WITNESS: Should I answer?

4 BY MR. HOFFMAN:

5 Q. Yes, you may answer. 12:29:54PM

6 A. They would ask for the bi-color lights.

7 Q. So in 2013, productions came into  
8 Paramount and asked for bi-color lights, correct?

9 A. Correct.

10 Q. Now, your declaration says that you 12:30:31PM  
11 were rental manager since 1999 but I believe  
12 today you said you've been in the rental manager  
13 position since 2006 or '7.

14 Can you explain why there's this  
15 difference? 12:30:46PM

16 A. As a rental manager, my job of renting  
17 has been the same the whole time. So I started  
18 doing rentals, which is still what I do as rental  
19 manager; it's just a level of within ourself,  
20 within our own payroll system of who is the 12:31:02PM  
21 actual lead person. But I've been doing the same  
22 job the whole time.

23 Q. Earlier today you mentioned Fernando  
24 Silva being in charge of expendables.

25 Are you aware of Fernando Silva selling 12:31:21PM



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1 any expendables other than those expendables  
2 being sold by Paramount?

3 MR. WARD: Object to form.

4 THE WITNESS: No, I'm not.

5 BY MR. HOFFMAN:

12:28:40PM

6 Q. There was also a question by Mr. Ward  
7 earlier about differences between the Astera  
8 product and the Colt Bi-Color product.

9 Are the differences you listed in  
10 response to that question all of the differences  
11 with regard to the Colt Bi-Color product and  
12 Astera?

12:32:15PM

13 A. No.

14 Q. Do you know all of the differences  
15 between the Colt product and Astera?

12:32:29PM

16 A. No, I do not.

17 Q. You also had some discussion earlier  
18 regarding declarations you did for Colt patent  
19 proceedings.

20 Is it fair to say that I contacted you  
21 regarding a declaration years ago and then more  
22 recently contacted you regarding a declaration  
23 for this particular proceeding?

12:32:59PM

24 A. Yes.

25 MR. HOFFMAN: Okay. I have nothing

12:33:30PM



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1 further. I just want to reserve reading and  
2 signing.

3 MR. WARD: We're off the record.

4 THE REPORTER: I need to put the  
5 transcript orders on the record.

12:33:53PM

6 Mr. Ward, I have you down for regular  
7 delivery of the final and of course the realtime.

8 Do you want a rough draft today?

9 MR. WARD: Yes, please, Brenda.

10 THE REPORTER: And Mr. Hoffman, do you  
11 want a copy of the transcript?

12:34:17PM

12 MR. HOFFMAN: No, thank you.

13 (Whereupon, the deposition was  
14 concluded at 12:34 p.m. PST)

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DECLARATION

I hereby declare I am the deponent in the within matter; that I have read the foregoing deposition and know the contents thereof, and I declare that the same is true of my knowledge, except as to the matters which are therein stated upon my information or belief, and as to those matters, I believe it to be true.

I declare under the penalties of perjury of the State of California that the foregoing is true and correct.

Executed on the \_\_\_\_\_ day of \_\_\_\_\_, 2024, at \_\_\_\_\_, California.

\_\_\_\_\_  
BRUCE WONDERLICK



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1     STATE OF CALIFORNIA         )   SS  
2     COUNTY OF LOS ANGELES     )

3             I, BRENDA R. COUNTZ, Certified Shorthand  
4     Reporter No. 12563 for the State of California,  
5     do hereby certify:

6             That prior to being examined, the  
7     witness named in the foregoing deposition was  
8     duly sworn to testify the truth, the whole truth,  
9     and nothing but the truth;

10            That said deposition was taken down by  
11    me in shorthand at the time and place therein  
12    named and thereafter transcribed and that the  
13    same is a true, correct, and complete transcript  
14    of said proceedings.

15            Before completion of the deposition,  
16    review of the transcript [   ] was [   ] was not  
17    requested. If requested, any changes made by the  
18    deponent during the period allowed are appended.

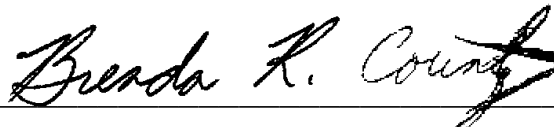
19            I further certify that I am not  
20    interested in the outcome of the action.  
21    Witness my hand this 20th day of April, 2024.

22

23

24

25



Brenda R. Countz, CSR No. 12563



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DEPOSITION ERRATA SHEET

Assignment No. J11102056

Case Caption: QUASAR SCIENCE LLC vs. COLT  
INTERNATIONAL CLOTHING, INC. dba COLT LED

Deponent: BRUCE WONDERLICK

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I  
have read the entire transcript of my deposition  
taken in the above-captioned matter or the same  
has been read to me, and the same is true and  
accurate, save and except for changes and/or  
corrections, if any, as indicated by me on the  
deposition errata sheet hereof, with the  
understanding that I offer these changes as if  
still under oath.

Signed on the \_\_\_\_ day of \_\_\_\_\_ 2024.

\_\_\_\_\_  
BRUCE WONDERLICK



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DEPOSITION ERRATA SHEET

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|                     |                        |                               |                                                         |                     |
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|                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>attached</b><br>40:14                                                                                         | 90:25<br>93:3<br>114:8                                                                                                                                                                                                                                                                                                                                                                                          | <b>benefits</b><br>114:19                                                                                                                                                                                                                                                                                                                                                             | <b>bit</b><br>17:15<br>44:3 92:9<br>104:8                                                                                                                                                                                                                                                                                                                                                                                                            | <b>branched</b><br>30:12                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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