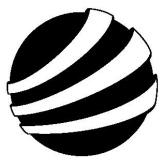


In the Matter Of:
Quasar Science vs Colt Intl. Clothing

IPR2023-00613 and IPR2023-00614

BRUCE WONDERLICK

April 17, 2024



ESQUIRE
DEPOSITION SOLUTIONS

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

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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.

1 APPEARANCES OF COUNSEL:

2 (All counsel and participants present
3 / via Zoom and/or teleconference.)
4

5 FOR THE PETITIONER:

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7 BY: TRENTON WARD, ESQ.

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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)	

LOS ANGELES, CA - WEDNESDAY, APRIL 17, 2024

9:32 A.M.

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

EXAMINATION

BY MR. WARD:

09:32:55AM

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

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

09:33:12AM

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

A. Sure.

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

09:33:27AM

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

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



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



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.

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.

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?

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



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



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



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



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

09:41:59AM

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.

09:42:09AM



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

09:42:37AM

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.

09:42:50AM

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



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



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

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



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

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



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



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



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



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

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



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



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



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



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



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



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



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



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



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



department?

MR. HOFFMAN: Objection, foundation.

THE WITNESS: That's not what I do.

BY MR. WARD:

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

10:13:25AM

A. They do sell gaffers tape.

Q. Do they sell rubber matting?

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

10:13:36AM

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

A. Yes.

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

10:13:52AM

MR. HOFFMAN: Objection, form,
foundation.

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

10:14:04AM

BY MR. WARD:

Q. Who is SJC Lighting?

10:14:15AM



800.211.DEPO (3376)
EsquireSolutions.com

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



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



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



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



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



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



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



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



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



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



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.
6 BY MR. WARD:

10:27:07AM

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



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



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



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

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

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



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



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



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



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



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



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



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



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



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



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



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



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



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



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?

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



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



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



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



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



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



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



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



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



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



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



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



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



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



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



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



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



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

11:28:34AM

18 A. Okay.

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

11:28:51AM

22 A. Correct.

23 Q. Does your department rent anything
24 else?

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



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



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



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



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



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



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



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



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



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 11:42:19AM
6 perfect. The warm white was a little off.

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 11:42:50AM
11 had a little issue.

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 11:43:12AM
16 continue to oscillate between different colors or
17 just change to an undesired color?

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 11:43:26AM
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.

24 Q. Do you recall these problems being
25 identified to Mr. Macias? 11:43:48AM



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



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



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



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



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

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



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



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



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



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



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



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



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



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



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



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



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



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



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

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?

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



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



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



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
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.

12:30:31PM

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
21 actual lead person. But I've been doing the same
22 job the whole time.

12:31:02PM

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



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



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)



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

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:

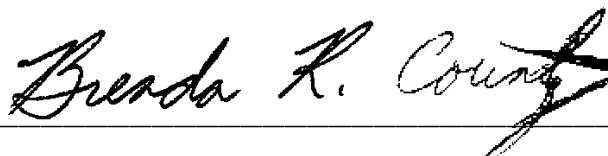
6 That prior to being examined, the
7 witness named in the foregoing deposition was
8 duly sworn to testify the truth, the whole truth,
9 and nothing but the truth;

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

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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Reason for change: _____

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	31:13, 18, 21 33:15	1997 16:22 17:21	2011 24:13 29:19 43:24 44:8 55:14	220 62:21
\$	1029 37:22 38:2	1998 16:15		25 21:9 22:14 35:22 102:24
\$10 72:25	1030 45:12	1999 17:21 18:10, 15 21:16 22:15 115:11	2012 31:22 57:7	26 44:15
\$20 73:1, 10	1031 26:17 27:2, 9 28:4		2013 67:21 102:23 103:4 108:3, 6, 20 114:24 115:7	28 40:8
\$750 72:15 73:4	1032 40:1, 3	2		2842 5:14
\$93 73:5, 9	12 103:6, 8 105:8	2 101:13	2014 40:8, 20, 23 41:5, 9, 16 67:21	3
0	12-A 114:23	2001-issue 46:8		
08 39:14	12:21 114:8	2003 23:17	2016 44:15	30 55:22 72:4 102:24
1	12:30 114:9	2003-2004 23:13, 15	2017 61:15 108:6	300 72:7
10 43:24 44:8 70:13 73:10	12:31 114:9	2006 101:19 115:13		32 72:4
10, 411, 582 87:17	12:34 117:14	2006-2007 23:25 39:13	2019 38:4 63:18	3200 54:14, 16
10, 566, 895 87:18	13-A 114:20, 21	2007 23:24 24:5, 16, 19 39:16 101:19	2023-613 6:3 27:3, 10 31:19 33:5 40:3 73:18	3rd 55:13
100 99:6	14 29:19 108:20 114:16	2008 39:16 53:16, 21 54:1, 21	2023-614 6:4	4
1023 55:7, 11 58:1 62:2	17 5:1	2010 23:19 53:16 54:1, 21	2024 5:1	4977 32:6 33:2, 8, 15
1026 43:14, 15 44:14	18 15:18			5
1027 33:3	1995 16:2 25:17		2067 73:18 82:12	50 22:18
1028				50-K

58:7	16:16	addition	103:24	argumentati
500	99	111:5	and/or	ve
70:4	16:18	additional	23:2	37:2,19
582	23:12	36:13	65:15	arrange
87:23	113:17,18	37:11	83:9	67:10
	9:32	address	105:18	art
	5:2	5:12 28:5	112:16	111:14,
7		32:12	ANGELES	18,25
	A	38:5,12	5:1	112:8,10,
7		affiliated	announce	18
115:13		38:20	55:19	article
70	A-S-T-E-R-A	affiliates	answering	57:25
55:23	63:15	81:2	8:12 9:18	58:22
728	A.M.	affiliation	answers	aspects
46:2,4,25	5:2	41:23	9:7,10	16:14
750	ability	affiliation	anymore	49:5 82:8
72:14	85:6	s	98:17	assist
	AC	25:23	apologize	77:1
8	62:20,22	agent	9:24	assume
	accordance	18:13,21	10:14	8:20
83	111:25	agents	apparently	12:18
71:4	112:18	18:16	48:22	30:9
84	accurate	agree	appears	54:12,13
71:5	18:7	33:13	35:9	89:18
895	29:20	37:10,17	apples	93:1,10,
87:24	70:2	79:11	73:8,9	12,14
	acquire	85:18,19	approved	assuming
9	67:10	agreement	35:15	37:6 75:6
	79:24	45:18,22	approves	assumption
90	active	47:7,13,	86:25	94:21
15:9	35:22	20 48:16	April	Astera
98:5,10	actual	agreements	5:1 16:18	63:14,24
92867	16:21	48:2,9	18:10,15	64:17
5:15	22:5 25:4	ahead	21:15	65:20
93	70:12	6:2 73:14	22:15	69:13,23
59:1,19	78:15	air	area	70:7,11,
95	88:17,22	58:8	38:15	15,23,25
15:9	90:14	alternative	areas	71:3,10,
113:18	98:12	103:10	110:10	11,18,25
97	115:21	amount		72:9,23
	adapter			73:5,10
	62:21,22			86:24
				87:2

116:7,12, 15	76:18 79:7 90:25 93:3 114:8	benefit 9:6	35:9	brain 61:15
attached 40:14		benefits 114:19	bit 17:15 44:3 92:9 104:8	branched 30:12
attendance 7:1	background 15:2	bi-color 63:10 65:14,21 69:12 71:7,20 72:5,20 78:5,7 80:13,14 86:8,9, 12,21 87:3,10, 16,20,21, 22 88:2,6 89:11 90:13,16 92:1 97:14,18 98:4,10, 25 99:8, 15,19,23 100:5,16, 21 101:2, 21,22,25 103:8,18 105:9 106:5,12 107:6 111:6 114:19,25 115:6,8 116:8,11	black 34:11 blended 53:24 block 40:15 Blood 38:5,10, 13 board 49:12 50:19 boss 23:5,9,14 24:7,12, 14 28:9, 23 106:20 107:1 109:10 bottom 27:1,6 31:17 37:25 40:16 43:14 bought 66:1 80:15,18 102:5 107:12,20 108:14 box 61:6,7 boy 16:16,17, 23,25 17:20	branding 47:17 break 9:14,15, 17,19 13:9 26:14 63:22 84:7 114:3,7, 11 breaks 9:11,12 Brenda 8:1 117:9 Brenda's 9:5 briefly 13:25 15:1 bright 102:12 104:9 brightest 97:23 brightness 99:8,16, 19 100:25 103:11,19 bring 17:15 18:4 43:6,7 84:21 85:6,12, 15 Bruce
attorney 5:19 6:17,23	bail 62:10 bar 65:13 Barely 73:23 base 35:3 based 21:18 68:21 72:24 85:14,16 86:3 basically 13:17 19:19 29:3 62:18 108:12			
average 71:24 72:6				
aware 5:22 34:5 35:12 69:15 83:7 101:1 102:15,19 109:23 110:2 111:7 115:25				
B	batch 80:16,19 batteries 27:21 64:21 battery 27:21,22 battery-operated 64:22 began 76:11,20 belongs 11:15	big 26:23 29:13 31:14 60:8 61:23 bill 102:14 bill-to		
B&m 55:12,18, 21 58:5 Bachelor 111:19 bachelor's 15:16 back 18:4 40:17 62:2,11 67:20,21 74:22				

5:4,14,	83:21	buying	43:20	83:3
16,18,22	86:18	60:10	call	case
6:1,5,13,	87:5,23	107:17	5:16 11:9	6:3 7:12,
16,25	88:5,9	buyout	12:23	16 14:4
7:14,16,	89:15	68:15,17	24:3	34:22
22 8:15,	90:6 91:7	69:4 86:3	54:17,18	cases
24 9:12	96:24	buyouts	76:15,17	5:21
10:5,17,	97:12	68:24	called	categories
23 12:13,	98:9	Byerly	18:16	49:11
23 13:8,	99:4,14	45:20	39:12	cetera
13 14:3	100:9,20	46:23,24	62:9	62:7
15:1,8	101:17	47:20	71:15	Chaipuzio
17:7,19	103:14		84:7	23:8
19:2,23	104:10		calls	chance
20:22	106:3,19		84:5	10:2
22:21	111:12,24	C	camera	change
23:4,11	112:17	C-H-A-I-P-	10:12	23:6
25:16	113:20	U-Z-I-O	92:18	43:1,2
26:15,20	built	23:9	Canada	92:12,17
27:12	89:18	C-I-N-E-O	56:14,23	93:17,22
31:15	bulb	65:25	cancel	94:15
33:1	110:14	C-Y-B-U-L-	76:14	104:15
37:22	bulbs	S-K-I	capital	changed
38:17	58:8	23:16	108:11,17	21:15
40:5	110:22	CA	card	92:9
43:17	bunch	5:1	22:10	changing
45:7,15	62:13	cable	cards	104:15
46:4	70:3	19:5	22:9,12	characteriz
49:1,15	business	cables	care	ation
50:18	15:7,10,	62:11	25:15	65:1
51:8,19	12,13,14	cadence	96:10	108:9
53:5	22:9,10,	9:13	97:4	charge
55:3,9,11	12 27:21,	Cal	105:6	18:20
56:3,9	23 29:1	15:3,5	Carl	68:6,24
61:14	30:23	Calamigos	24:9,22	69:4
63:24	31:2,4	84:3	25:14	115:24
65:5,24	76:8	calender	28:24	charged
66:9	101:3	10:10	109:12	56:18
69:10	110:3,7,	California	carts	68:13,15,
70:23	12	5:15	19:19	16,17
73:13,19,	buy	27:13	82:21	check
22 74:2,	69:25			
24 75:4	108:13			
76:16				
77:6,17				
80:1,6				
82:3,10				

98:12	code	86:9,13,	communicati	competitive
chips, '	22:1,7	21 87:2,	on	34:16
58:4	collaborati	9,15,18	13:1,2	complete
Cineo	vely	90:12	79:9	28:4
65:22	25:9	91:25	companies	completely
66:6,14	college	95:9,14,	25:21,24	29:9
67:8	15:3	21,22	26:1,6,7,	component
69:13	color	96:5,15,	10,11	47:16
city	54:15,16	20 97:8	35:20	computer
102:14	55:24	98:9,25	49:4,14,	10:25
claimed	58:18,19,	99:7,15,	18,22	11:8,10,
97:15	24 64:2,	22 100:4,	50:2,4,8,	20 12:1,
clarificati	4,10,11,	15 101:2,	14,19,20,	3,10,14
on	14,16	13 102:19	23,24	17:14
8:17 14:9	65:12,14,	103:18	52:18,21	computers
87:12	16 70:2	104:3,4	company	11:3
classes	88:7	105:9,14,	15:23	12:15
52:10	92:9,12,	24 106:5,	27:18	concerned
client	17 98:11,	12 107:5,	29:7,13	28:24
86:5	12,13,14,	9,14,17	49:20	103:15
climb	22 99:25	108:3,7,	53:8	concerns
19:11	100:10	19,20	66:1,16	47:15
close	102:6	109:1,5,	69:6	concluded
12:4	104:9,18	24 111:6	88:22	117:14
closed	105:11	114:25	101:8	conditionin
12:5,14	colors	116:8,11,	comparative	g
45:2	63:19,25	15,18	ly	58:8
closely	64:1,15	Colt's	64:12	conducted
58:2	92:16	69:12	compare	105:21
closely-	Colt	77:24	73:8	conducting
related	6:20 7:7	87:21,22	compared	7:23
111:20	63:10	88:19	99:20	configure
closer	64:12	89:11	104:4,22	18:6
17:9,15	65:20	97:14,15	comparison	connection
clothing	69:23	98:4	73:3	5:23
6:20	70:7,16	103:8	compensated	consistent
88:18,19,	71:7,10,	114:19	7:3	55:24
25	12,20	combined	compensatio	58:24
club	72:5,19,	112:14	n	constantly
65:12	24 73:10	comment	7:11	113:11
	76:7 78:5	74:10,13	100:1	
	79:19	commercial	competition	
	80:10,12	85:22	37:12	
	81:2 82:9			

contact	correct	102:6,25	created	37:8,11
38:6	6:11,21,	103:1,4,5	44:11	Cybulski
contacted	23 7:13	104:3	55:22	23:16
116:20,22	13:11,12	105:22	76:12	24:5,8
contained	14:25	106:2,24,	creations	27:19,24
100:24	16:3,24	25	47:14,17,	28:1,7,9
continue	18:9	107:14,15	21	42:13,16
92:16	19:10,16	108:3,24	crew	
contract	20:4	110:4,15,	68:18,25	D
84:16	22:17	22,23	CRI	
86:4,6	24:5,6,21	113:24	59:1,19	D-I-S-T-E-
conventiona	25:18,19	114:21	88:7	F-A-N-O
l	27:10,11	115:8,9	97:19	24:11
55:23	28:10,12	correction	98:5,10,	dang
conversatio	30:15,16	88:7	14,25	78:23
n	31:19,20	105:12	106:1	darker
74:14,17	32:4,5,8,	correctly	Csernecky	102:13
79:12,13	13 35:10,	103:16	91:16	date
81:15,19	15 36:25	cost	99:5	29:17,21
conversatio	37:8 39:6	72:8,9	100:18	40:2
ns	41:16	cost-	cumbersome	43:23
50:25	42:1	effective	61:8	44:7,15,
78:13,15	44:8,9	103:9	current	20 75:17,
79:1,18	48:17	counsel	18:22	18
81:1,5	50:14	5:20 8:24	24:14	date's
82:2	53:22	9:2	69:11	67:20
converse	54:2,3	couple	cursor	dated
79:16	57:17	7:17	27:7	31:22
cool	59:11	10:18	customer	55:13
58:9	67:17	56:22	21:2,19,	74:22
105:12	68:11,12	74:19,20	21 35:3	day
copy	70:8,9	court	36:19	10:10
27:12	72:16	8:1	37:4,6	16:10
117:11	73:6,11,	courtroom	39:2,3,4,	daylight
corner	12 75:9	6:10	6,24	55:25
29:19	76:21	cover	66:10,12	58:25
31:18	77:2,3,24	60:5 64:8	67:4,11	59:3,7
33:8 38:1	79:13,14,	99:24	68:9 69:5	64:3,13
43:15	16,17	Covid	86:12,24	65:15
corporate	82:21,22	63:18	customers	92:5,22
80:24	84:22,23	Craig	34:21	98:6
	85:8,13	23:8	36:6,13,	101:24
	91:4		17,18,24	
	94:5,6,20			
	95:10			
	100:14			
	101:14			

104:16	degree	7:17,23	115:15	document
deal	15:17	8:3 10:9,	differences	26:16,25
68:24	111:19	19 13:14	116:7,9,	27:1,6
dealing	degrees	14:21,24	10,14	29:18
63:17	113:8	117:13	dim	38:1
deals	delivery	Depot	92:12	40:11
111:10	117:7	69:25	dimmed	45:12,17,
dealt	department	70:4	92:8,15	18 47:12
39:11,17	18:3,17	describe	dimmer	74:2
December	20:2,3,5,	15:1	102:10,11	documents
31:22	15,17	17:22	direct	7:22,25
declaration	21:11	23:4	82:12	10:22
7:4 10:25	22:16	112:25	99:11	12:8
12:1,10	23:1	describes	Dirty	13:23
13:15	24:25	45:18	39:12,22	dollar
14:23	25:3	describing	disclosed	86:3
21:22	34:1,6,17	19:15	97:15	dollars
73:14,19	36:5,12,	description	discuss	80:25
74:4,11	24 40:17	18:8	13:9	draft
75:1,4,6,	60:8,13	21:25	discussion	76:12
9,19	82:23	design	17:17	117:8
76:12	83:5,8,	47:17	70:19	due
77:1,19	12,14,15	111:21,23	76:21	100:1
79:2 81:9	86:8	112:13	116:17	114:18
82:11	104:24	113:2,3,4	discussions	duly
87:6	107:6	designing	47:15	5:5
97:13	110:21	113:21,23	76:25	duties
103:7	departments	desirable	Disney	17:22
114:16	24:24	103:10	86:1	22:20
115:10	83:8	determine	Distefano	25:10
116:21,22	dependent	80:25	24:9	104:23
declaration	67:6	85:10,11	109:12,13	E
s	depending	100:12	Distefano's	e-mail
116:18	72:12	105:13	24:22	31:21,22
decrease	97:20	developing	distributed	32:10,11,
69:7	depends	58:4 77:1	99:24	12 33:1
definition	37:4	device	distro	40:7,13
111:13,17	49:10	87:10,16	19:5	74:6,8
112:1,4,	51:1	113:21	division	e-mailed
7,19	deposed	difference	20:13	35:18
definitions	7:14	72:8		
113:6	deposition			
	5:23			

40:2	25:17	69:5	5:9	25 20:1,
Eagle	30:15	envision	114:13	2,5,24
101:18	employees	30:20	examined	27:14,16,
earlier	25:2 81:2	equality	5:6	19 28:6,
25:16	91:17	47:18	Excuse	18 29:14,
40:3	employment	equipment	78:18	21,23,24
84:20	43:1	17:2	Executive	30:9,21
86:20	end	18:4,24	24:23	31:3,8,24
103:14	16:18	19:1,4,7,	exhibit	32:4,7,
107:13	ended	9,17,18	26:17	16,22
115:23	28:20	20:11	27:2,9	33:9,22,
116:7,17	29:3,8,12	39:1,21,	28:4	25 34:6,
East	39:14	23 46:11,	31:12,13,	16 35:5
5:14	ends	15 56:21	18,21	38:5
easy	64:20,21	68:18,19	33:3,15	40:16,19
56:1	energy	80:9,10,	37:22	41:15,22
Edison	53:9	11 82:15,	38:2,4	42:1,7,17
58:7	97:20,22	16,20,25	40:1,2,3,	43:21
102:14	engineering	83:2,3,	7 43:14,	44:11,21
edition	111:20	23,24	15,25	45:1
100:21	113:1	84:11,14,	44:14	60:7,8,9
educational	engineering	22 85:5,	45:12	83:7
15:2	/design	7,12,19	55:3,7,11	110:21
eight-foot	112:12	110:12	58:1 62:2	115:24
108:1	enter	estimated	73:18	116:1
electrical	45:21	94:14	82:12	expensive
111:20	entered	evenly	existing	56:17,18
112:11	48:1,8,16	99:23	100:22	65:8,9
113:1	entering	events	exists	experience
electrician	47:7,13	113:12,13	81:25	51:25
21:20	entertainment	evolutionar	expand	52:4,8
22:4	100:22	y	36:6 37:7	111:21
electronics	111:22	evolved	44:3	112:11,15
12:16	entire	61:3	73:23	113:1,23
emergency	20:20	65:16	expect	experienced
10:4	entities	68:23	29:2	58:2
emits	37:11	exact	expendable	experiences
99:23	entity	42:11	20:14,15,	26:3
103:12	44:21	95:18	25 33:25	expert
employed		109:17	60:12	89:6
		EXAMINATION	expendables	113:10
			19:23,24,	explain
				115:14

external	21:7,10	finance	17 110:5,	36:9
62:19	28:14	49:4	6,24	40:25
eye	31:5,8,23	50:14,20	Forest	41:11
92:19	32:3,11,	52:8	5:15	42:9,24
101:18	21 40:8,	financial	form	43:9 45:3
104:8	16,18	51:11,16	30:1	47:8,23
	41:7,14	52:14	32:17,23	50:9
	45:21	find	33:19	52:15
F	48:19	43:2 70:4	34:18	58:14
	91:15,18	106:19	36:8,15	59:5,17,
face	107:4,5,8	finding	37:14,19	25 60:17
10:15	110:7	43:5	40:24	67:12
fair	115:23,25	fine	41:10,17	76:22
116:20	Fernando's	95:19	42:8,24	77:11,25
fairly	43:11	113:8	45:4	79:4
29:13	field	finish	48:3,11,	81:22
familiar	80:5	8:9,12	18 50:22	88:20
38:7,10	111:20	9:18	52:16	89:2,8
87:8,15	fighting	finished	53:1	91:8
fast	10:3	93:3	54:11	108:9
69:21	figure	firm	57:12,18	109:6,16
feature	30:23	5:19	58:15	110:17
58:23	filing	fits	59:4,24	112:2,20
features	29:17	65:11	60:18	115:2
97:15,17,	43:23	fixture	65:1	frame
25 114:18	44:7	61:24	67:13	62:9
February	fill	62:24	71:3 76:5	framing
29:19	21:7	110:15	77:10	62:6
44:15	filled	fixtures	79:4,20	free
fee	21:11	47:16,21	81:21	10:12
7:7	film	54:6,8	108:9	12:25
feedback	29:25	61:25	109:15	76:16
105:3	50:5 58:2	62:1	110:16	front
feel	112:12	111:1	112:3	6:10
10:12	113:2,19	florescent	116:3	10:20,22
12:24	filming	54:8	format	11:3 12:9
76:16	56:21	97:21	88:6	full
feeling	57:6	98:5	found	5:12
10:6,11	final	99:21	106:18	11:23
Fernando	91:2	102:25	foundation	Fullerton
20:24	117:7	103:10	30:18	15:4,6
		104:6,7,	32:18,24	
			33:20	
			34:2,19	

G	George 17:6,24	95:25 96:11	29:11 91:14,15	heat 60:15 97:25 98:2 102:15
gaffer 18:1 47:3 61:1,17 68:18	give 6:2 9:7, 9,21 17:4 18:1,23 76:8 86:2 92:18 105:3	good- looking 78:23 goods 20:14 102:14	guys 18:5 19:11 25:5	held 17:17 25:20 70:19
gaffers 34:6,8	giving 17:19	gray 110:9	H	helpful 30:25
garbage 113:6	glad 10:6	green 59:1 100:1,4, 13,24 102:2 105:17,18	handful 20:23	Hereas 45:19
gas 49:4,22 50:19,24 52:4	Glee 46:21 47:5	green/ magenta 105:10	handled 20:15,16	hey 107:1
gave 92:20,23	global 69:9	Greenberg 5:19	happen 8:5 96:17	high 36:21 56:19 88:7 97:19 105:9,25 106:1
gear 86:3	goal 29:23 36:5,23 37:7	grip 83:14	happened 88:12 89:18	high-output 58:4
gel 105:12	Godzilla 56:15,16, 21 57:6 58:12 59:14 60:4 61:3	ground 7:18 62:12	happening 106:8	high- quality 105:14
gels 59:22 60:4,10, 12 100:1 102:4,5	Gonzalez 38:6,22 39:9 40:9,23 41:5	group 84:21 86:5 95:1	happy 9:14	highest 25:13
general 110:11	good 5:11 8:13 9:20,25 10:1,11, 16 12:6, 12 13:3 64:13 88:7 90:24 92:10	guess 43:12 53:3,16 54:5,16 76:23 108:14	hard 9:8 12:7	hired 15:25 16:2
generally 8:25 20:7,8,12 47:3 53:19 68:21 85:20,21, 25 93:24 98:4 100:23 111:3	Guillermo 87:9,15	guesstimate 72:2	hardware 111:2 113:24	historically 20:19
generate 64:11	guy 22:3,24	Guillermo 87:9,15	head 9:8 22:3	Hoffman 6:19 13:10,16, 24 17:7, 13 30:1, 17 32:17, 23 33:19
			headed 10:13	
			heads 9:21	
			hear 10:5,6 14:12,13 33:11	
			hearsay 42:24	

34:2,18	109:6,15	identifies	information	International
36:8,14	110:16	58:24	27:14	al
37:1,13,	112:2,20	identify	43:21	6:20
18 40:24	114:6,14	7:25 35:9	informed	88:19
41:10,17	115:4	imagine	106:15,17	introduced
42:2,8,	116:5,25	89:16	initial	88:15
18,23	117:10,12	impossible	42:15,21	introduction
43:8,25	Home	69:20	43:23	n
44:18,23	69:25	inactive	44:7 76:3	88:17
45:3,8	70:4	44:15	96:15,21	invention
46:1,7,	honest	include	initially	87:19,20
13,19	77:14	64:3	16:11	88:2,3,4
47:8,22	honestly	97:25	23:5	100:21
48:3,11,	44:12	including	77:22	inventions
18 49:2,	54:15,25	13:10	96:6	47:14
9,19,23	57:8	24:25	107:13	inventory
50:9,15,	69:22	69:17	install	106:14,
22 51:4,	88:11	112:13	18:5	16,21,22
9,20	97:1	incomplete	instance	invested
52:1,6,9,	hospital	44:1	66:8	26:8
15 53:1	9:23,25	increase	instruct	49:16,17
54:11	hour	36:24	109:13	50:1,13
56:4	9:14 58:8	individual	instructed	51:10,11
57:12,18	human	27:25	109:7,9	investing
58:14	19:14	individuals	instructs	52:11,23
59:4,17,	83:2	45:19	9:2	investment
24 60:17		47:6	insufficien	51:16
64:25	I	48:2,9,	cies	investments
67:12		10,17	96:7	50:7
74:5,24	i.e.	84:24	inter	52:14
75:9,11,	110:14	85:2	5:23	invoice
14 76:4,	idea	industry	interacted	32:6
5,12,21,	35:1	21:18	78:12	33:2,8,
22 77:10,	47:10	52:23,25	interacting	13,14,15,
25 78:12,	ideas	100:22	39:9	17,18
16,19	47:14	102:23	interaction	34:15
79:1,3,	identified	103:12,20	31:9	38:4,8
16,20	27:25	104:7	interfaced	invoices
81:6,21	28:8	112:16	39:5	32:16,22
86:14	33:18	informal	involved	45:7,10
88:20	92:25	13:19		
89:2,8	96:6			
90:2 91:8				
93:18				
94:18				
103:22				
108:8				

49:3,7,8,	job	Kino-flo	lay	72:5,20
15 51:5	15:20	104:5	7:18	78:5
56:25	16:21	Kinos	lead	80:13,14
113:20	18:22,24	104:15	22:23	86:9,12,
involvement	21:13	kit	105:4	21 87:1,
28:18,20,	28:25	65:9	115:21	2,3,9,15,
21,22	45:10	72:12	learn	20,21,22
ipad	115:16,22	102:5	106:11	88:3,6,8
64:19	Jobs	knowledge	learned	89:11
IPR	113:7	14:14	96:23	90:13,16
6:3 27:2,	John	52:13	learning	94:8,12,
9 31:18	23:16		96:5,14,	17 97:14,
33:5 40:3	24:4,7		19	24 98:10,
73:18	27:25	L	LED	25 99:15,
	28:9		47:16,17,	19,23
issue	judge	labeled	21 48:5	100:21,22
9:22	6:10	31:18	53:11,17,	101:1,2,
92:11	June	73:19	18,19,20,	5,6,7,13,
issues	55:13	lack	21,25	20 102:3,
60:15	Junior	97:25	54:2,10,	8,18
95:10,22	45:20	lacked	20,23	103:8,18
98:1,2	jury	100:24	55:13,20	105:9
102:1,7,	6:10	ladder	56:2	106:5,12
15		19:13,14	57:6,10,	107:6,14
items	K	ladders	16,22	108:7,19
33:21,24		19:8,9,	58:4,6,9,	110:8
	Kelvin	11,17	11,19	111:6,23
J	58:19	82:21	59:2,20,	112:14
	59:3	83:2,3	22 60:3,	113:5,21,
J.A.	key	lady	5,16,21	24 114:19
45:20	99:9,10,	53:5	61:20	LED's
46:23	16	Lane	62:24	97:21
January	killed	5:15	63:9,10,	LEDs
40:8,19,	39:15	large	14 64:24	57:11
23 41:5,8	kind	29:12	65:18,19,	64:8
43:24	7:18	late	21 66:6,	94:3,4
44:8	10:20	71:16	14,21	98:5
Jerry	13:19	law	67:5,10,	101:12,15
45:20,23,	14:7 16:8	5:19	17 68:11,	102:9,16
25 46:6,	kinds	lawsuit	13 69:11,	left
11,17	19:21	77:20	12,13,14	23:3,12
47:4			70:7,11,	left-hand
			23,25	62:4
			71:7,20	legal

88:22	111:2	12 53:21	116:9	looked
length	113:13,24	54:6,8,20	Listen	14:6,23
72:13	lighting	62:18	14:11	78:22
85:17	15:13,20	69:17,24	lists	LOS
lengths	18:7,19	72:16	44:14	5:1
107:21	19:4,6,	84:25	Litepanels	lost
Leo	17,22	92:12	101:8,12,	45:9
17:6,24	20:6,16	95:8	20 102:2,	lot
level	21:4,20,	96:9,11	8,16,20	15:22
100:1,4,	23 22:4,	97:7	103:3	16:12,16,
13 115:19	16 25:4	100:22	LLC	17 38:14,
levels	26:10	101:1,5,	27:15,17	17 40:17
102:2	34:23,25	6,7	28:6	56:17
life	35:10,12	102:10,25	43:22	60:24
49:5	36:4	104:16,	load	62:17
lifetime	39:20,23	20,24	56:1	82:16
57:3	40:17	111:8,9,	located	83:24
light	46:5 50:1	11,23	84:14	84:9,10
19:13	52:24	112:14	location	85:23,24
53:12,17,	55:12,13,	115:6,8	84:2	86:2,6
18,19,20,	18,21,23	likelihood	85:25	98:18
25 54:2,	56:20	96:1	locations	102:11
9,10,24	58:5	likes	84:11	lots
55:25	68:20	97:4	85:24	52:10
59:3 61:9	82:14,16,	limited	long	60:10
87:21	20,25	100:23	45:7 46:6	61:4 95:8
92:15	83:2,12,	lines	73:1	low
97:5,8	22,24	55:22	74:15,25	22:25
98:4,7,8,	84:21	114:17	75:19	23:22
10,25	85:5,7	link	76:11	72:25
99:8,9,	86:7	11:12	80:20	100:1,3
10,11,15,	87:10,16	list	90:9	105:10
16,23,24,	89:6	18:23	93:16,23	
25 100:5,	91:10,12	35:15,18,	95:7	M
16,24	93:24	21 36:25	106:13	
101:9,20,	103:12,20	58:23	107:10,19	Macias
21,22	104:21	listed	longer	88:10,16,
102:18	109:20,23	28:11,14	22:11	18,24
103:13,16	110:3	29:17	30:14	89:5,10,
104:22	111:1,22	33:17	80:22	21 91:3,
105:1,2,	112:13,15	40:10	107:18,19	20 92:25
10,15,25	113:2	41:25		94:1,7,
110:21	115:1	43:24		15,23
	lights	48:17		
	19:5,10,			
	12 29:7,			

Macias'	make	manufacture	Memos	21
87:9,15	14:9,11	s	87:20	mind
	21:1 22:9	94:2	88:2	8:4,7
Mactech	31:14	marked	100:21	39:19
55:13,20	36:19	26:16	mentioned	95:11
56:2	64:13	27:2,9	17:24	minimal
57:5,11,	68:24	33:3 38:1	25:16	105:18
16 58:6	84:7	45:12	65:19	minimize
59:2,20,	93:23	55:7	69:12	11:19
22 60:3,	104:20	73:18	82:19	minimum
5,16,21	110:19	market	83:2	36:18,20
61:20	makes	69:11	84:20	mischaracte
62:24	65:22	78:8	102:20	rization
65:19	making	matches	103:3	30:18
69:13	50:7	33:14	107:13	56:5
92:14	65:12	materials	115:23	58:15
102:20	69:19	33:18	met	79:4
103:3	94:11	83:9	78:16,19	81:22
Mactechs	Malibu	math	89:17	86:15
66:2	84:4	73:4	90:22	89:3
101:4	man	matter	91:1	93:19
made	22:25	6:17 70:1	meter	94:19
13:21	23:22	96:11,12	92:20,23	mix
16:15,17	29:6	97:6,9	98:23,24	64:15
56:15	manager	matting	99:1,2,4	mixing
63:14	21:23	34:9	100:12,	64:15
64:7	22:7,17	means	15,17	molding
74:18,20	24:3,16	6:8	105:21	83:16
76:4	28:12,15	meet	meters	money
80:16	40:16,19	88:9	104:22	39:13,22
93:17,22,	41:15	meeting	mic	49:17
25 94:3,	115:11,	42:15,22	17:8,14	51:12
4,12	12,16,19	89:10	Michael	68:17
101:9	managers	member	27:19,24	monitor
107:25	28:5	46:2,25	28:7,25	12:4
111:10	41:25	68:25	30:11	month
magenta	manpower	Memo	31:10	35:19
92:21,23	17:3	87:9,15	42:12	93:9
100:2,4,	manufacture	memory	43:11	months
13 102:2	94:10	76:1,2	middle	93:11,12,
105:17,18	manufacture	r	28:3	15,21
mail	94:8,17		Midnight	
11:11			71:15,18,	
mainstream				
104:6				

94:15	multiyear	35:23	48:3, 11,	occupational
morning	78:11, 25	normal	18 49:2,	22:1, 7
5:11 7:19	79:5	84:19	9, 19, 23	occurring
9:25	Mundy	104:5, 6	50:9, 15,	57:6
78:21	45:20, 23,	number	22 51:4,	October
motion	25 46:11,	24:24	9, 20	23:19
15:14	17 47:4,	33:8, 14,	52:1, 6, 9,	off-lot
27:14, 16	19	15 36:6,	15 53:1	84:11
28:5, 18	mutual	21, 24	54:11	offer
31:23	45:21	37:8	56:4	55:24
32:7 35:5	47:7, 13	45:19	57:18	86:8
43:21		69:7	58:14	offered
48:20	N	70:12, 14	59:4, 17,	63:2
50:8		71:17, 20,	24 60:17	91:21
52:23, 25	named	24	64:25	office
112:16	53:5	numbers	67:12	113:16
motion-picture	necessarily	6:3 14:4	76:5, 22	oil
52:21	30:24	87:11, 17	77:10, 25	49:4, 14,
move	37:15	O	79:3	18 50:19,
17:8	91:5		81:21	23 51:25
19:19	92:20	oath	86:14	one-by-ones
23:23	93:1 94:9	6:6	88:20	101:9
73:13	95:6	Object	89:2, 8	one-offs
87:5	needed	57:12	90:2 91:8	108:13
103:6	19:5	79:20	93:18	110:1
moved	25:12	116:3	94:18	one-page
16:20	27:20	objection	103:22	26:25
22:24	negative	30:1, 17	108:8	45:17
23:2, 3	105:6	32:17, 23	109:6, 15	onscreen
moving	Nickelodeon	33:19	110:16	87:6
69:21	60:24	34:2, 18	112:2, 20	open
83:3	61:11	36:8, 14	115:2	9:19
MP	night	37:1, 13,	objects	11:10
29:14, 21,	9:22 10:4	18 40:24	8:25	36:19
23 30:21	71:16	41:10, 17	13:18	opened
31:8	Nip/tuck	42:2, 8,	obsolete	11:23
32:4, 15,	46:9, 12,	18, 23	111:10	operations
22 33:9	14	43:8, 25	20:10	40:17
38:5	nod	44:18, 23	111:3, 5	opinion
41:22, 25	9:8	45:3, 8	occasions	
42:6, 16	non-active	46:1, 7,	111:7	
44:11, 21		13, 19	occupation	
45:1		47:8, 22	47:2	

50:24	36:16		35:15	partes
51:21	61:2	P	36:7	5:24
52:17	95:12		37:12	partner
97:5	101:22,23	p.m.	38:20	55:13
opinions	oscillate	117:14	40:20	partners
52:20	92:16	paid	41:15	45:20
opposite	ourself	6:25	54:21,24	partnership
32:1,2	115:19	21:20	61:11,25	47:18
option	output	22:4	62:25	
30:14	97:19	paint	63:2,11	parts
57:15	overcame	83:16	66:3,9	47:16
64:24	96:15,21	pandemic	67:2	61:4
86:11,18	overcome	75:24,25	68:7,10,	62:13
options	96:6	panels	14 69:8	party
57:23	overseas	101:9	80:12	7:7
85:4,9,10	93:25	102:8	82:15,16	passed
Orange	94:2,3,5,	papers	83:9,23,	29:10
5:15	8,10,11,	12:9	24 84:13,	79:11
order	13,17	paperwork	22,25	93:5
19:11	oversee	48:20	85:1,6	past
20:25	82:13	paragraph	86:7,12	50:8
21:1,4	83:21	55:17	89:22,23,	62:25
96:13	oversees	82:13	25 90:5,	patent
97:7	24:24	87:5,8,	20 91:4,	73:20
ordering	owned	13,14	17 94:24	87:11,17
82:14	26:1,5	97:12	106:4,11	112:6,9,
83:22	54:13	98:3	107:17	19 116:18
orders	60:9	100:20	108:2	patents
17:2 18:2	68:3,4,18	102:23	109:2,21,	14:6,17
39:24	owner	103:6,8	24 110:2	47:14
117:5	112:6,9	105:8	111:7	87:18,20,
ordinary	owner's	114:16	114:24	24 88:2
111:13,	73:20	Paramount	115:8	97:16
18,25	112:19	15:24	116:2	pay
112:7,10,	ownership	16:1,2	20:21	13:4
18	26:12	18:18	51:12	84:25
original	owns	20:13,20	62:9,13	85:6,15
75:19	68:25	25:17	76:25	payroll
79:6		26:4	77:20	115:20
80:16,19		30:15	95:1	people
originally		32:16	104:23	21:13
27:21		33:25	106:14,15	22:24
		34:6,16	112:22	
			113:11	

23:2	25:13	13:6	pole	14:20, 22, 24
35:7, 8	78:17, 20	picking	22:25	
51:5, 8,	80:2	84:5	23:21, 23	prepare
10, 12	111:13,	picture	poll	13:14
54:7	18, 25	11:24	23:22	prepared
66:23	112:7, 9,	15:14	popular	74:4
67:1, 7	18 115:21	27:16	61:4, 9	present
69:1, 19	personally	28:5, 18	63:15, 19	50:21
86:5	41:6	32:7 35:5	64:23	president
91:10, 13	98:24	43:21	portion	58:5
93:24	99:1, 14,	48:21	62:4	press
95:19	18 100:3	50:8	position	55:11, 17
96:9, 25	103:15	52:23, 25	15:19	pretty
98:21	105:13	57:25	16:4, 10,	92:21
111:11	perspective	58:1	19 18:11	previous
people's	69:9 76:9	112:16	21:25	28:9
25:11	Perusing	picture-	23:20	previously
percent	31:12	worthy	24:17, 20	27:25
22:18	43:14	90:25	80:6	33:14
55:22, 23	44:6	Pictures	82:19	82:20
59:1 71:5	45:13	15:24	113:16	83:1
99:6	55:5	27:14	115:13	
percentage	73:16	31:23	positions	price
70:10, 22, 24	petitioner	68:10	25:20	72:14, 19
perfect	5:20	pieces	positive	105:4, 7
74:1 92:6	111:14, 17	61:5	105:6	priced
period	phases	62:13	possibly	72:23
17:21	47:17	place	43:12	primarily
23:10, 15	phone	38:16	Potentially	22:16
24:12	12:18, 20,	plug	34:20	primary
40:23	23 74:14	62:22	power	11:20
41:5	76:15	64:21	55:23	printout
44:11	78:15	plugged	61:7	43:19
54:2, 21	84:5	62:20	62:14, 17, 18	prior
72:17	phones	plugs	pre-covid	53:21
78:11, 25	12:15	58:7	90:10	75:24, 25
88:12	photo	point	premium	100:20
101:16	34:11	22:8	56:19	101:1, 13
106:4, 6	58:11	56:12	72:23	102:19, 24
107:8, 16	photograph	89:16	preparation	103:4
108:5, 20, 25	62:4	95:19		113:9, 15
person	pick	96:9 97:2		

problem	103:3, 4	96:15	56:20	80:9, 22
12:23	104:3, 4	98:19	58:22	107:14
93:2	105:25	102:18	60:4	108:7, 22
95:12	106:5	103:2	67:5, 10	
97:9	116:8, 11,	109:20, 23	71:17	purposes
100:6	15	110:4	74:10, 13	6:1
		114:25	77:23	pursued
problems	production	115:1		30:21
92:14, 24	38:11		provided	
96:15, 21	39:12	professiona	7:4 20:11	push
	46:21	l	22:11	97:22
procedures	57:20	26:3	30:4	
13:17	58:6, 13		34:15	put
proceeding	68:21, 22	professiona	51:16	9:8 10:10
116:23	69:3	ls	54:10	16:7, 8
	71:12, 13,	58:3	58:20	17:2
proceedings	14 72:3,	program	60:3, 6	27:18
5:24 7:21	21, 22, 25	17:25		39:24
75:4 81:3	84:12, 17,	progression	provider	74:5, 7
111:15	18 85:17	23:5	88:19, 25	98:22
116:19	86:25		96:10	117:4
process	97:10	project	providing	Putting
13:20	101:18	17:5, 20	40:22	16:12
		57:1	41:7 59:3	
processing	productions	59:14	74:14	
32:22	18:23	67:22	82:14	Q
produces	38:19		83:9, 22	
98:6	39:3, 6	projects	108:3	quality
99:24	61:17	60:22		105:10, 25
	70:17, 18,	61:19	PST	
producing	23, 24		117:14	Quasar
98:15	71:1, 2, 6,	promote		5:20
	9, 11, 23	99:13	pull	66:23, 25
product	72:1	promoted	11:24	67:4, 10,
54:4	82:15	16:22	pulled	16 68:10
55:19, 22	83:23	18:11	11:1	69:14
56:3	84:9, 17	24:15		111:14
66:10	85:3, 4, 22	proposes	purchase	
86:13	95:20	111:17	35:5, 7	question
87:21	96:12		36:21	8:10, 12,
89:19	114:25	proprietor	66:9, 15	15, 17, 19,
91:2, 20,	115:7	57:2	108:1, 11	21, 23
25 92:1				9:1, 18
93:4, 6	products	prototype	purchased	14:14
94:16, 24	20:16	91:4	80:18, 21	41:2 48:6
95:3, 10,	30:4	provide	purchases	55:1
14, 21, 22,	58:10	8:19 20:6	108:16, 17	70:21
23, 25	77:24	29:24	purchasing	77:22
96:6, 20				110:18

116:6,10	realtime	receive	117:6	74:15
questions	117:7	7:7,11	regularly	82:4,6
7:20 8:25	reason	15:16	108:6,10,	90:14
10:18	6:13 82:7	receiving	15	91:3 92:5
14:8	109:18	7:10	relate	93:2
50:21	reasons	recent	47:15	94:25
114:4,15	103:11	79:13	52:24	95:2,3,7,
quick	recall	recently	related	16 96:2,
73:4	30:8	29:9	52:21	8,14,16,
quote	32:15	74:16	relating	17,19
40:14	39:18,20	116:22	47:21	97:1
41:8	40:18	recognize	relationshi	101:11,16
quotes	41:4,7,	38:12	P	102:21
40:22	14,21	74:2	42:11	104:19
	44:10,20	record	43:11	remote
R	45:1,5	5:12 6:2	89:19	10:19
Ranch	47:6,19	9:9	relationshi	remotely
84:4	50:6	17:16,17	ps	7:24
rare	53:15	26:13	42:12	10:18
20:10	54:9	63:21	release	removed
rarely	56:10,11	70:19	55:11,18	83:20
56:7	57:5,22	114:2,8	relied	rent
rate	58:18	117:3,5	105:23	19:3,24,
72:22	59:2,19	redirect	remake	25 46:11
Ray	60:15,21	114:6	56:15,21	54:23
38:6,22,	61:10,13	redo	remember	56:9,12,
24 39:2,	67:25	74:16	9:7,9	16,19
3,5,9,17,	74:25	refer	14:5	57:3
20,24	75:17,18	87:19,21	29:14,16	61:20,22,
40:8,22	78:10	88:1	32:21	23,25
41:4,8	88:15	105:20	38:11	62:5
58:4	89:10,17,	114:17	39:8,22	63:8,10
re-go	21,24	reference	40:22	66:6,10,
79:8	90:16,19,	114:22	44:13	15,16,18
read	21 92:24	references	50:7	67:19
13:15	93:2,8	33:2	56:2,13,	68:5
111:12,16	95:9,24	referring	16,23	69:1,8
reading	96:3,5	113:5	57:8	71:9
117:1	101:12,20	regard	59:16	72:11,12
recalling	102:1,7	116:11	60:24,25	80:11
	106:6	regular	67:22	82:20,23
	107:10		68:3	84:14,18

97:7	54:20	representin	40:14	roughly
rentable	66:11,12	g	87:23	22:14
95:5	67:1 70:7	6:20	reviewed	23:10
rental	71:24	request	14:4	73:5,9
18:3,13,	80:10	9:16 76:3	revised	row
16,21	86:22	86:19	75:6,7	13:6
20:3,11,	87:1	requested	revision	rubber
16 21:5,	95:20,23,	57:16,20	75:10	34:9
11,23	25 96:9,	63:7	revisions	rules
22:7,15,	25	66:5,14	74:21	7:17
16,25	108:19,23	67:4,11,	Revolution	run
24:3,16,	115:16	25 91:20	53:9	9:23 58:9
25 25:3	rents	requests	rig	61:7
26:10	62:1	63:3	19:12	64:19
36:5,12,	rep	86:25	rigged	running
23 72:14	29:7	require	19:10	69:23
76:9 86:8	repeat	99:25	rigger	
104:24	41:1	required	15:21	S
106:14	repeated	9:1	16:5	
110:12	13:18	84:12,24	rigging	sales
115:11,	replacement	105:12	19:14	20:1 29:7
12,16,18	54:6	resemble	47:3	106:9,10
rentals	110:14	58:11	right-hand	Sarah
16:20	report	reserve	29:19	80:3
22:3,23	25:6	117:1	31:17	Sarah's
25:4	reporter	respect	33:7 38:1	80:4,6
70:11,22	8:1 87:12	7:11	43:15	save
80:3,8	117:4,10	49:14	rigs	58:8
103:24	reporting	52:14	16:12	saver
115:18	24:4	85:5	role	97:20
rented	represent	105:2	30:20	saving
36:4	37:11	response	42:6 47:1	97:22
46:14	representat	73:20	roles	school
56:6 57:4	ive	107:3	42:16	15:15
60:13,14	21:21	116:10	room	Science
62:25	representat	restate	10:4	5:20
65:23	ives	70:21	62:17	67:17
67:16,23	21:19	96:4	rough	68:10
71:18,21,	represented	review	117:8	69:14
25 72:6	6:16	5:24		111:14,19
114:24		13:23		
renting		14:1,3		
18:21				
39:20,23				

scope	34:8, 9,	35:6	43:13	showed
40:25	11,21,22	43:22	45:11	61:6
41:11	35:2, 4, 8	83:10	55:3	showing
42:8,18,	106:16	86:5	73:15	10:8
23 43:8	109:14,20	servicing	shareholder	82:10
44:18,23	110:5,8,	37:10	26:7	91:9
45:4,8	24 111:1	set	sharing	shown
46:1,7,	selling	15:13,20,	31:13	29:18
13,19	27:20	21 16:4,	37:23	33:15
47:9,22	106:5	13 18:7,	55:6	58:10
48:12,18	107:5,9	19 21:23	73:17	62:3
49:2,9,	109:1,4	22:16	87:6	87:10,17
19,23	110:3,12	40:17	Sherry	shows
50:10,15,	111:6	43:6,7	53:5	16:13
22 51:4,	115:25	46:5 60:4	shipped	17:1
9,20	sells	65:6	93:17	38:25
52:1,6,9,	34:6	68:20	shoot	60:24
16 94:19	110:13,21	82:14	85:24	104:25
112:3,21	sending	83:12,22	shooting	113:3,15
scream	32:16	86:7	68:9	SIC
10:14	sense	99:21	shop	35:10,12
screen	69:10	103:12,19	83:15,16,	36:4
7:24	110:19	104:12	17	sign
11:16,17,	sentence	112:15	short	83:15
22 17:15	102:22	113:4	15:18	signature
26:18,20	separate	sets	73:1	40:15
31:11,13	20:3	29:25	short-term	signed
37:23	September	70:14,15,	85:21	74:21
45:11	57:7	17 113:19	show	significant
55:4,6	served	setting	16:9	ly
73:15	22:15	28:25	17:3,6	65:8
82:10	50:18	seven-plus	27:1	signing
97:13	service	82:5	31:11	117:2
Secretary	21:19,21	Sexy	33:3	Silva
27:13	36:13	39:12,22	37:21	21:7,10
43:20	services	5:14	39:22	28:14
seek	27:15,17	shape	55:2	31:5,8,23
52:13	28:6,19	98:5	60:25	32:3,12,
select	29:25	share	71:16	21 40:8,
98:7	31:24	7:22,24	84:3 86:1	13,16,18
selected	32:7	26:15,17	91:4,6,7	41:7,14,
105:11	34:15	39:25	94:23	21 43:6
sell				
27:19				

45:21	53:2	55:20	62:6, 8, 10	stomach
47:19	70:13			9:22
81:8, 20	sold	specialty	standard	
106:3	33:21, 24	65:11	102:23	stop
109:1, 4	102:5, 14	specific	start	109:4
110:13	106:12, 18	10:18	8:12 16:8	stopped
115:24, 25	107:3	18:14	74:23	15:14
Silva's	109:24	64:14	75:11, 14	street
42:6	110:6	99:12	87:13	102:10
similar	111:7, 9	specificall	started	Streetlight
48:1 67:8	116:2	y	24:13	s
simultaneou	sole	17:23	46:9	102:13
sly	57:2	19:21	96:25	
59:12, 15	son	64:12	108:2	strike
single	28:2, 9	66:19	115:17	39:14, 15
72:9, 11	sort	77:8	starting	56:1
79:9	65:13	spectrum	29:15, 20	stringers
single-	89:19	64:11	54:7	58:7
color	sound	98:11, 13	state	strip
59:10	8:13 9:20	100:10	5:12	65:12
site	13:3	spell	15:3, 5	studio
84:14	29:20	24:10	27:12, 13	38:18
situation	sounding	65:24	43:20	83:11, 13
42:25	49:12	Spelling	87:14	Studios
43:1, 3	50:19	38:19	88:1 98:3	55:12, 19
six-inch	sounds	spend	99:22	study
101:10	10:16	36:20	stated	15:5
size	12:12, 13	86:4	42:21	stuff
37:4, 7	44:12	spent	statement	25:11
85:16	source	58:3	27:13	48:5
SJC	104:21	78:25	105:24	74:15
34:23, 25	sourcing	spiff595@	states	84:6
skill	86:5	earthlink.	40:13	93:25
43:6, 7	sp	net	Steve	subject
111:13,	19:5	32:13	113:7	32:6 33:2
18, 25	speak	staffing	stock	successful
112:7, 10,	8:4 81:8	21:6	63:4 66:3	7:8
18	speaking	stage	stockholder	sufficient
slight	76:11	85:23	26:6	37:7
92:21, 23	specially-	stages	stocking	92:3, 4
small	developed	84:18	82:14	99:8, 16,
		stand	83:22	19 100:25

103:11,19	12:20	telling	text	19 16:4,
sufficientl	104:14	39:19	12:23	21 17:11,
y	takes	tells	Theoretical	21 18:18
105:9,14,	93:16,23	25:15	ly	20:20
25	talent	temperature	37:20	23:10,15
supplied	99:11	58:18,19	theory	24:2,12
17:2 39:1	talk	59:3 98:6	10:24	26:5
57:20	42:16	105:11	13:4	28:23
supply	50:25	temperature	thing	32:15
18:24	71:16	s	8:3 9:5	36:3
19:2 61:7	79:24	55:24	11:14	39:8,11,
62:14,17,	80:1 82:7	58:24	12:12,22	17 40:19,
19 97:11	107:4	ten	13:18	23 41:5,
Support	talked	13:6 21:8	98:13,21	22 44:10
73:20	13:16	57:4	99:12	53:11,13,
surprised	79:6,7	75:21	105:17	17,18,25
77:13,16	81:24	ten-minute	things	54:2,21
switch	82:5	114:7	11:14	57:15,23
98:7	talking	tend	18:20	72:17
105:19	81:25	25:11	19:19	74:16,25
switchable	82:6	term	21:18	75:20
88:8	86:22	73:1,2	26:8,9	76:1
97:19	tape	terminated	48:14,25	78:21
sworn	34:7,8,12	44:22	49:5	80:20
5:5 6:9	team	45:2	52:18	89:24
Sylvania	25:14	test	64:21	90:9,11,
54:5	technical	98:24	69:19,25	12,15
system	53:3	100:11,15	83:1	93:5
22:2 35:7	technically	104:24	98:18	95:4,7,
111:11	25:7,8	105:16,	110:9,10	13,18,22
115:20	technician	20,23	113:9	97:23
systems	112:15	testified	thought	101:16
111:22	technicians	5:6 106:3	86:20	102:9,11
112:13	46:5	testify	91:23	106:4,6,
T	technology	6:14 77:9	106:14,23	13 107:8,
	55:21	testimony	107:2	10
	69:20	13:10	110:8	108:12,25
T-12	television	77:23	thread	109:11
88:6	58:3	81:2,20	31:21	115:17,22
table	112:12,16	testing	32:11	timeframe
	113:2	100:8	time	23:7
			7:21 8:5,	44:13
			6,7 9:11,	53:23
			12,13,15,	89:17
				95:15
				96:16,18

107:11	tones	55:21	60:3, 5,	turned
times	100:2, 4,	56:2	16, 21	27:22
13:6	13	57:22	61:20, 21,	104:19, 21
20:10, 23	top	59:6, 7, 8	22 63:9,	tv
21:6, 8, 10	29:18	61:23	10 64:17	29:25
52:22	33:7	62:24	65:18, 19,	50:4
57:4	40:10	63:14, 20,	20, 21	two-by-four
74:20	total	24 64:12,	66:21, 23,	101:10
90:7	71:17, 20	24 65:14,	25 68:11,	two-inch
95:17	78:12	22 66:6,	14 69:11,	101:9
99:17	totem	14 67:5,	11, 12, 15,	type
105:1	22:25	8, 10, 17	16, 23, 25	54:9 78:6
title	23:21, 22	69:13, 14	71:7, 12,	87:10, 16
18:14	track	71:3, 10	18, 21, 24,	typed
21:15, 24	69:20	72:10, 11,	25 72:5,	74:9
22:2, 5	transcribe	13 73:1,	20, 23	types
24:1, 22	8:2	2, 5, 11	73:4	19:1 30:4
80:7	transcript	76:7 78:5	79:25	47:16, 21
titled	9:6	86:9, 13,	80:13, 14	70:4 98:8
55:12	117:5, 11	21 87:2,	86:9, 24	typically
today	transportat	22 88:3,	87:1	9:13
6:6, 14	ion	6, 8 89:11	103:10	
7:1 8:3	83:15	90:13, 17,	106:12	U
9:6 10:6	Traurig	19, 22	107:6, 9,	
13:14	5:19	97:14, 18,	14, 17	
14:19	Trent	21, 24	108:1, 3,	U.S.
24:17	5:18	98:4, 5,	7, 13, 14,	87:17
63:12, 13	true	10, 25	19 109:2,	uh-huh
65:2	20:19, 21,	99:8, 15,	5, 14, 25	9:8
115:12, 23	22 38:5,	19, 21, 23	110:5, 6,	Um-hum
117:8	10, 13	100:5, 7,	8, 14, 24	43:18
today's	68:19	16, 21	111:6	55:10
14:24	102:9	101:2, 6	tungsten	understand
Todd	truth	102:25	55:25	6:5, 8, 19
29:1, 5	6:9	103:9, 19	58:25	8:16, 22
42:13	truthfully	104:17	59:7	9:3, 24
91:15, 18	6:14	105:9	64:4, 13	10:2, 20
99:5	tube	106:5	65:15	13:8
100:18	53:12, 19,	114:19	92:22	14:14
told	20 54:2,	tubes	98:6	88:4
77:8, 12	10, 20, 23	57:6, 10,	101:24	91:19
81:13		16 58:9,	104:16	97:14
86:23		12, 19	turn	
97:1		59:2, 10,	12:3 17:8	
		20, 23	18:2	

109:1	vendors	16 32:20	89:4, 9	105:10, 14
understandi	69:6, 7	33:1, 5, 6,	90:4	wife
ng	verbal	23 34:4,	91:11	10:3
19:3 31:7	9:7	24 36:11,	93:20	window
34:14	verbiage	22 37:5,	94:22	11:20
110:13	14:7	16,21,24	104:1	26:22
understood	verified	39:25	108:18	windows
8:20	100:3	40:4	109:8, 19	11:9, 11
14:16	104:2	41:3, 13,	110:20	Wolf
77:21	verify	20 42:5,	112:5, 24	58:5
94:1, 7	98:9	14, 20	114:1, 4,	Wonderlick
undesired	99:14, 18	43:4, 13,	10 115:2	5:4, 11, 14
92:17	103:21	16 44:4,	116:3, 6	73:19
union	verse	19, 25	117:3, 6, 9	114:15
22:6 46:4	73:10	45:6, 11,	warehouse	wood
unit	version	14 46:3,	104:11, 13	83:16
61:22, 23	90:23	10, 16, 22	warm	worded
62:2, 15,	93:6, 7	47:11, 25	54:17	78:1
16, 19	versions	48:7, 15,	92:6, 22	words
units	80:16	23 49:6,	105:12	14:11, 12
15:18	107:20	13, 21, 25	watch	work
61:21	versus	50:12, 17	102:10	7:18
Universal	64:16	51:2, 7,	ways	11:14, 25
55:12, 18	65:14	14, 24	49:11	25:9
56:18, 25	70:15	52:3, 7,	website's	43:2, 5
57:2 63:8	vice-	12, 19	43:20	47:4 54:6
66:1, 18	president	53:4	WEDNESDAY	66:8
updating	24:23	54:19	5:1	81:16, 17
74:18	W	55:2, 6, 8	week	94:16
utilize		56:8	72:18, 20	112:15
58:7		57:14, 21	73:4, 5, 9,	113:18
v	wait	58:17	10	worked
	8:9, 11	59:9, 18	weeks	15:24
vague	wanted	60:2, 20	56:22	16:1
14:10	18:2 19:2	63:21, 23	weight	17:1, 20
variation	Ward	65:4	55:25	29:6 31:8
64:6	5:10, 18	67:15	wheel	38:25
vendor	17:16, 18	70:20	65:17	46:17
35:6	26:13, 15,	73:13, 17,	white	75:8
36:20	19 30:3,	21 76:10,	54:17	working
	19 31:11,	16, 19, 24	92:6, 22	16:13
		77:15	99:25	18:6
		78:3		
		79:10, 22		
		82:1		
		86:17		
		88:23		

41:4,8,	year	
15,22	23:18	z
56:20	29:10,15	
58:2	53:14,15	Zoom
74:23	56:24	7:24
75:11,14	61:13	11:9,13,
79:1	75:12	20,21,22
94:2,8	90:14	17:11
96:20	102:14	26:22
113:3	105:1	
	107:12,16	
works	108:12	
76:7		
103:16	years	
	15:8 21:9	
workshop	22:14	
69:17,24	52:11	
worried	58:4	
70:1	60:23	
Wozniak	67:18	
113:7	75:15,21	
	76:20	
writing	79:11,15	
74:15	82:5	
written	83:20	
74:15	90:7,8	
	102:24	
wrong	107:22,25	
39:10	108:6	
76:1	110:6	
107:24	111:21	
wrote	112:11,14	
74:5	113:1,14,	
	15 116:21	
x	yes-or-no	
	9:10	
X-U	yesterday	
53:6	13:15	
	81:16,17	
Xu	106:3	
53:6	Young	
	29:1,5	
y	42:13	
Yahoo		
11:11		