

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

EXTREMITY MEDICAL, LLC, a New  
Jersey limited liability  
company,

Plaintiff,

vs.

FUSION ORTHOPEDICS, LLC, a  
Delaware corporation,

Defendants.

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) No.  
) 2:22-CV-00723-PHX-  
) GMS  
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DEPOSITION VIA ZOOM OF  
LEONEL DOMINGUEZ

June 7, 2023

9:05 a.m.

Reported by Jovanna Roman, RPR  
AZ Certified Reporter No. 50725  
Esquire Deposition Solutions  
Job No. J9771189



Extremity Medical, LLC  
EXHIBIT 2011  
Fusion Orthopedics, LLC v. Extremity Medical  
Case IPB2023-08894  
EsquireSolutions.com

APPEARANCES OF COUNSEL

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Also Present:

Mr. Samuel Rocereta

1 that facilitates the insertion of the nail into the  
2 intramedullary canal. So as you note the terminal end or  
3 sometimes called the head is the more bulbous section of  
4 the nail and as shown in 18 and that is another word to  
5 call terminal end is to call it the nail head.

6 Q. So -- I'm sorry. What is the nail termination  
7 then?

8 MR. VOWELL: Object to form.

9 THE WITNESS: Nail termination?

10 BY MR. LINDENBAUM:

11 Q. Yes. You say that the person skilled in the art  
12 would understand --

13 A. Yeah, nail termination being the end of the --  
14 the end of the terminal end of the nail, if you will. So  
15 the termination of the nail, that's where the nail  
16 basically stops. It's where the nail is cut. That angle,  
17 that oblique angle that we discussed earlier that creates  
18 that oblique surface that is, quote, that is the nail  
19 termination. That's where the materials end in the nail  
20 in the terminal end of the nail.

21 So I think we're calling it all the same  
22 thing, whether we call it a nail head or terminal end or  
23 nail termination. Nail termination is more specific than  
24 that. It's really the very end of the nail before there's  
25 just air above it.