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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CANATEX COMPLETIONS :
SOLUTIONS, INC., :
 :
Plaintiff, :
 :
Vs. :
 : CIVIL ACTION NO.
WELLMATICS, LLC; GR : 4:22-cv-03306
ENERGY SERVICES, LLC; :
GR ENERGY SERVICES :
MANAGEMENT, LP; GR :
ENERGY SERVICES :
OPERATIONS GP, LLC; AND :
GR Wireline, L.P., :
 :
Defendants. :

[REDACTED]

VIDEOTAPED / REALTIMED DEPOSITION OF
JEFFREY R. GOLINOWSKI
JANUARY 31, 2023
PRESENTED AS 30(B)(6) CORPORATE REPRESENTATIVE
OF CANATEX COMPLETIONS SOLUTIONS, INC.

[REDACTED]

1 VIDEOTAPED / REALTIMED DEPOSITION of JEFFREY R.
2 GOLINOWSKI, Presented As 30(B)(6) Corporate
3 Representative of Canatex Completions Solutions, Inc.,
4 produced as a witness at the instance of the Defendants,
5 and duly sworn, was taken in the above-styled and
6 numbered cause on Tuesday, the 31st day of January,
7 2023, from 9:18 a.m. to 6:33 p.m. before Pat
8 English-Arredondo, CSR (TX), RMR, CRR, CLR, in and
9 for the State of Texas, reported by stenographic machine
10 shorthand, at the law offices of Cabello Hall Zinda,
11 PLLC, 801 Travis Street, 14th Floor Conference Center,
12 Houston, Texas, 77002, pursuant to the Federal Rules of
13 Civil Procedure; that the Witness will read the
14 deposition.

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[REDACTED]

A P P E A R A N C E S

COUNSEL FOR PLAINTIFF CANATEX COMPLETIONS SOLUTIONS,
INC.:

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SERVICES, LLC; GR ENERGY SERVICES MANAGEMENT, LP; GR
ENERGY SERVICES OPERATIONS GP, LLC; AND GR WIRELINE,
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ALSO PRESENT:

Mr. Robert Sutherland, Canatex
(Present as noted in the record)

VIDEOGRAPHER:

Mr. Ben Harwood
Veritext Legal Solutions

COURT REPORTER:

Ms. Pat English-Arredondo
CSR (TX), RMR, CRR, CLR
Veritext Legal Solutions

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WITNESS: JEFFREY R. GOLINOWSKI

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(REPORTER'S NOTE: All quotations from exhibits are reflected in the manner in which they were read into the record and do not necessarily denote an exact quote from the document.)

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1 an engineer with some experience and using their common
2 sense would realize you need to have equalization ports
3 as part of the tool?

4 MR. CABELLO: Objection, form.
5 Mischaracterizes the testimony.

6 A. Other than common sense experience, downhole
7 tool experience is what is required.

8 Q. (By Mr. Aurentz) You would agree that having
9 equalization ports in the release tool to ensure that it
10 equalizes and therefore separates, is not a new idea
11 that you came up with in the context of designing this
12 tool. Right?

13 MR. CABELLO: Objection, form.

14 A. No, it is not a new idea. Because if you have
15 experience, you would be exposed to ensuring you don't
16 have this vacuum lock scenario.

17 Q. (By Mr. Aurentz) Putting equalization ports
18 into the design would basically be a tool that would be
19 in the toolkit of an experienced engineer who has worked
20 on downhole tools. Fair?

21 MR. CABELLO: Objection, form.

22 A. Fair. Yeah, fair statement to put that in.

23 Q. (By Mr. Aurentz) With respect to the
24 expansion chamber, is that the chamber into which the
25 locking piston expands?

Texas Rules of Civil Procedure
Part II, Section 9, Evidence and Discovery
Rule 203

203.1 Signature and Changes.

(a) Deposition transcript to be provided to witness. The deposition officer must provide the original deposition transcript to the witness for examination and signature. If the witness is represented by an attorney at the deposition, the deposition officer must provide the transcript to the attorney instead of the witness.

(b) Changes by witness; signature. The witness may change responses as reflected in the deposition transcript by indicating the desired changes, in writing, on a separate sheet of paper, together with a statement of the reasons for making the changes. No erasures or obliterations of any kind may be made to the original deposition transcript. The witness must then sign the transcript under oath and return it to the deposition officer. If the witness does not return the transcript to the deposition officer within 20 days of the date the transcript was provided to the witness or the

witness's attorney, the witness may be deemed to have waived the right to make the changes.

(c) Exceptions. The requirements of presentation and signature under this subdivision do not apply:

(1) if the witness and all parties waive the signature requirement;

(2) to depositions on written questions; or

(3) to non-stenographic recordings of oral depositions.

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