

UNITED STATES PATENT AND
TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPTICIS CO., LTD

Petitioner,

v.

INNEOS LLC,

Patent Owner.

Case No. IPR2023-01256
U.S. Patent No. 7,198,416

**PATENT OWNER'S NOTICE OF REMOTE DEPOSITION
OF DR. ALAN E. WILLNER UNDER § 37 C.F.R. 42.53(d)(4)**

Pursuant to 37 C.F.R. § 42.53(d), Patent Owner Inneos LLC, by and through its attorneys, hereby files this Notice of Deposition of Petitioner's declarant, Dr. Alan E. Willner, in IPR2023-01256. Counsel for the parties have conferred and agreed that Patent Owner will conduct cross-examination by remote deposition of Petitioner's declarant as follows:

Witness: Dr. Alan E. Willner

By: Videoconference, login details to be provided

Date: Thursday, August 29, 2024

Time: 9:30 AM Pacific Time

The cross-examination will take place remotely using videoconference means and will be taken before a Notary Public or other officer authorized by law to administer oaths under 35 U.S.C. § 23. The deposition will be recorded by stenographic means, and may be recorded by videographic means by agreement of the parties.

The parties will meet and confer if necessary to ensure that Deponent has technology sufficient to attend this remote deposition, and the parties will conduct testing on the videoconferencing platform at least two (2) days in advance of the

deposition to establish that Internet bandwidth is sufficient, and the downloaded software is functioning correctly.

Date: August 14, 2024

Respectfully submitted,

/s/ Barry J. Herman

Barry J. Herman (Reg. No. 51,254)
Christian E. Mammen (*pro hac vice*)
Carrie Richey (*pro hac vice*)

Counsel for Patent Owner Inneos LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on August 14, 2024, that a true and correct copy of the foregoing was served on Counsel for Petitioner via filing through the P-TACTS, as well as by delivering a copy via electronic mail to the following email address(es):

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