

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HOWARD INDUSTRIES, INC.

Petitioner,

v.

CAPSA SOLUTIONS LLC

Patent Owner.

PRI2023-01274

Patent 7,594,668

IPR2023-01275

Patent 8,215,650

EXAMINATION OF

CRAIG RYDINGSWARD

Thursday, August 1, 2024

9:01 a.m. Eastern Daylight Time

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Remote Deposition of CRAIG RYDINGSWARD, a
Witness herein, called for examination by counsel
for Petitioner in the above-entitled matter,
pursuant to notice, the witness being duly sworn by
MICHELE EDDY, RPR, CRR, a Notary Public in and for
the Commonwealth of Virginia.

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A P P E A R A N C E S

ON BEHALF OF THE PETITIONER:

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1 ATTENDANCE, Continued

2

3 ON BEHALF OF THE PATENT OWNER:

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12 DeAnna J. Barnett, Litigation Paralegal,

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14

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1 INDEX

2

3 WITNESS: CRAIG RYDINGSWARD PAGE

4 EXAMINATION BY MR. JORDAN 6

5

6

7 E X H I B I T S

8 (Attached to the Transcript)

9 DEPOSITION PAGE

10 Exhibit 1041 Capsa Healthcare Computing Carts 33

11 M38e Information Sheet

12 Exhibit 1042 Carelink Mobile Nurse Station 36

13 Information Sheet

14 Exhibit 1043 SlimCart Assembly & Operating 39

15 Manual

16 Exhibit 1044 GCX Healthcare Solutions 46

17 Jaco EVO-20-HS-NB LCD EHR Cart

18 Information Sheet

19

20 PREVIOUSLY MARKED AND REFERRED TO

21 Exhibit 2018 Craig Rydingsward's Declaration 15

22 for IPR2023-01274

1 P R O C E E D I N G S

2 August 1, 2024

3 9:01 a.m.

4 - - -

5 CRAIG RYDINGSWARD,

6 having been duly sworn, testified as follows:

7 EXAMINATION BY COUNSEL FOR PETITIONER

8 BY MR. JORDAN:

9 Q. Good morning, Mr. Rydingsward. Can you 09:01:20
10 please state your name and title for the record. 09:01:23

11 A. Yes, sure. So, Craig Rydingsward. I'm a 09:01:27
12 Senior Vice President here with primary 09:01:31
13 responsibilities over sales for our acute care and 09:01:34
14 extended care division. 09:01:37

15 Q. Have you been deposed before? 09:01:40

16 A. I have not, no. 09:01:43

17 Q. All right. So let me just go through a 09:01:45
18 few housekeeping items. 09:01:48

19 First, if you don't understand something 09:01:49
20 that I've asked, please let me know and I'll repeat 09:01:51
21 it or rephrase it. If you do answer a question, I'm 09:01:54
22 going to assume that you've understood it. Is that 09:01:57

1 fine? 09:02:00

2 A. Yes. 09:02:01

3 Q. Great. 09:02:05

4 As you know, we're having this deposition 09:02:05

5 transcribed by a court reporter, which means there's 09:02:07

6 a written record of what we say today. So a few 09:02:10

7 things to keep in mind. First, only one of us 09:02:13

8 should talk at a time to make sure the record is 09:02:16

9 clear. I'll let you finish an answer before I ask 09:02:18

10 my next question. Would you please kindly let me 09:02:23

11 finish my question before you answer it? Is that 09:02:26

12 all right? 09:02:28

13 A. Yes. 09:02:35

14 Q. And everything we do today, 09:02:40

15 Mr. Rydingsward, has to be spoken, no verbal 09:02:42

16 communication such as a head shake or a nod. Is 09:02:44

17 that understood? 09:02:46

18 A. Yes, that's understood. 09:02:52

19 Q. Finally, if you need a break, let me know, 09:02:53

20 we can take a break. I just ask if there's a 09:02:55

21 pending question that you answer it before you do, 09:02:57

22 and I'll try to take a break every hour or so. 09:02:58

8

1	Okay?	09:03:01
2	A. Sounds good.	09:03:04
3	Q. You understand that you're under oath	09:03:05
4	today?	09:03:07
5	A. Yes.	09:03:10
6	Q. Do you have any documents with you?	09:03:10
7	A. I do not, no.	09:03:12
8	Q. Do you have any windows or applications	09:03:15
9	other than Zoom open on your computer?	09:03:17
10	A. I do, but I could shut them down. I have	09:03:21
11	my Outlook Client open.	09:03:23
12	Q. Other than Outlook, anything else?	09:03:28
13	A. No.	09:03:30
14	Q. We're here today to discuss your testimony	09:03:35
15	related to two IPR proceedings. I'll refer to the	09:03:37
16	U.S. Patent Number 7,594,668 as the '668 patent. Is	09:03:41
17	that all right?	09:03:48
18	A. Yes, that's fine.	09:03:50
19	Q. And I'm going to refer to the U.S. Patent	09:03:53
20	Number 8,215,650 as the '650 patent. Okay?	09:03:55
21	A. Fine.	09:04:03
22	Q. Mr. Rydingsward, did you prepare for your	09:04:11

1 deposition today? 09:04:13

2 A. What do you mean by prepare? 09:04:18

3 Q. Did you review any documents in advance of 09:04:19

4 your deposition today? 09:04:21

5 A. No, not so much documents, but I consulted 09:04:25

6 with my lawyers. 09:04:28

7 Q. Other than discussions with counsel, did 09:04:33

8 you consult with anyone else to prepare for your 09:04:35

9 deposition today? 09:04:37

10 A. No, I did not. 09:04:38

11 Q. Approximately how much time would you say 09:04:48

12 you spent preparing for today's deposition? 09:04:50

13 A. I believe it was about an hour and a half 09:04:58

14 that we consulted on the phone. 09:04:59

15 Q. Have you read the '668 patent? 09:05:06

16 A. I have not read it in its entirety. 09:05:09

17 Q. Have you read portions of it? 09:05:13

18 A. I have, yes. 09:05:15

19 Q. What portions did you read? 09:05:17

20 A. I believe it was just the beginning 09:05:20

21 section of '668. 09:05:22

22 Q. How about the '650 patent, have you read 09:05:32

10

1 that one? 09:05:35

2 A. I have not, no. 09:05:36

3 Q. Are you familiar with the claims of the 09:05:44

4 '668 patent? 09:05:48

5 A. The claims, are they -- they're a section 09:05:50

6 in the patent, right? 09:05:53

7 Q. Yes, that's right. 09:05:55

8 A. I'm familiar with the -- what the claims 09:05:58

9 are -- well, excuse me. I'm not familiar with 09:06:00

10 exactly what the claims are, yes, so I'm familiar 09:06:04

11 with the claims section of the patent but not the 09:06:15

12 specificity of what the claims are in the patent. 09:06:19

13 Q. I want to shift gears and ask you a bit 09:06:32

14 about your background and experience. Can you 09:06:35

15 describe your position at Capsa? 09:06:38

16 A. Sure, yes. So as I mentioned I'm the 09:06:40

17 Senior Vice President here with responsibility over 09:06:42

18 sales in our acute care and extended care divisions 09:06:46

19 of the entire sales organization. And the directors 09:06:53

20 effectively report up to me, those segments. So, 09:06:57

21 all sales-related responsibilities roll up to me. 09:07:00

22 Q. About how long have you been at Capsa? 09:07:06

11

1 **A. So I've been at Capsa since Capsa was** 09:07:08

2 **acquired in 2015 -- I'm sorry, since Rubbermaid was** 09:07:13

3 **acquired by Capsa in 2015.** 09:07:19

4 **Q. Were you at Rubbermaid at the time Capsa** 09:07:27

5 **acquired the cart business from Rubbermaid?** 09:07:29

6 **A. Yes, I was.** 09:07:36

7 **Q. What was your position at Rubbermaid?** 09:07:37

8 **A. I was the Director of Sales for the** 09:07:39

9 **Eastern Division. We are divided into east and** 09:07:42

10 **west, and I manage the Eastern Division.** 09:07:51

11 **Q. What did your duties entail as Director of** 09:07:53

12 **Sales of the Eastern Division at Rubbermaid?** 09:07:56

13 **A. I was responsible for managing the sales** 09:07:59

14 **organization of the Eastern Division, so ultimately** 09:08:01

15 **delivering revenue performance for the Eastern** 09:08:12

16 **Division.** 09:08:15

17 **Q. Are you familiar with Rubbermaid's** 09:08:16

18 **litigation involving the '650 patent?** 09:08:18

19 **A. Can you be more specific? There are** 09:08:22

20 **litigations with --** 09:08:25

21 **Q. Are you familiar with Rubbermaid's patent** 09:08:28

22 **suits involving the '668 patent?** 09:08:31

12

1 **A. I'm aware there were suits. I don't know** 09:08:37

2 **really the specifics related to them, as I wasn't** 09:08:39

3 **involved in them.** 09:08:42

4 **Q. Mr. Rydingsward, do you have a college** 09:08:47

5 **degree?** 09:08:49

6 **A. I do, yes.** 09:08:49

7 **Q. When did you graduate college?** 09:08:52

8 **A. I graduated in 2003.** 09:08:54

9 **Q. Do you recall the month?** 09:09:04

10 **A. Yes. So I guess it would have been in** 09:09:10

11 **May. Yes, I believe it was May.** 09:09:12

12 **Q. And your -- your first job in the medical** 09:09:18

13 **cart industry was after you graduated college,** 09:09:20

14 **right?** 09:09:23

15 **A. Yes, it was certainly after college, yes.** 09:09:24

16 **Q. What was that job?** 09:09:28

17 **A. So I worked for a company called AMT** 09:09:31

18 **Systems out of college. I joined them basically** 09:09:34

19 **right after gradation. I don't recall the month,** 09:09:41

20 **but it was a month or two after gradation. We were** 09:09:45

21 **focused on -- well, auto identification solutions,** 09:09:51

22 **so barcode technology in the healthcare space. And** 09:09:54

13

1 my primary responsibilities were there selling those 09:10:00

2 different barcode-related solutions into healthcare. 09:10:03

3 That means barcode-related solutions being mounted 09:10:06

4 on medical carts. 09:10:15

5 Q. The barcode solutions were related to 09:10:16

6 medical carts; did I hear you right? 09:10:21

7 A. Yes. So, I mean, it was a variety of 09:10:23

8 different barcode-related solutions. If you think 09:10:25

9 about it, in a healthcare setting, often a medical 09:10:27

10 cart is rolling up to a patient bedside, and they 09:10:31

11 are scanning medications out of a medical cart and 09:10:33

12 delivering those medications to the patient. So a 09:10:38

13 lot of the software and the hardware barcode side of 09:10:42

14 things were solutions that we provided at AMT 09:10:48

15 Systems. More often those pieces of hardware, like 09:10:51

16 for the wristband printers, label printers were 09:10:53

17 often mounted on medical carts. 09:10:59

18 Q. Your job at AMT Systems was in sales; is 09:11:01

19 that right? 09:11:03

20 A. Yes, I was a sales rep at AMT Systems. 09:11:06

21 Q. Did AMT manufacture medical carts? 09:11:16

22 A. No, they did not. 09:11:18

14

1 Q. Back to your college degree, can you tell 09:11:25

2 me what your degree is in? 09:11:28

3 A. Yes, it's business administration. 09:11:31

4 Q. Is it fair to say you do not have an 09:11:38

5 engineering degree, right? 09:11:40

6 A. Yeah, that's correct. 09:11:43

7 Q. Do you consider yourself a person of 09:11:49

8 ordinary skill in the art for the design of medical 09:11:50

9 carts? 09:11:54

10 MR. KWAK: Objection, form. 09:11:56

11 A. I'm sorry, I thought Jim had a comment 09:12:10

12 there. If there was no comment, can you repeat that 09:12:12

13 question for me, Dan? 09:12:16

14 Q. Do you consider yourself a person of 09:12:17

15 ordinary skill in the art for the design of medical 09:12:19

16 carts? 09:12:21

17 MR. KWAK: Objection, form. So you 09:12:23

18 can -- you can answer if you understand the 09:12:26

19 question. 09:12:28

20 A. Okay. No. I mean, I wouldn't consider 09:12:30

21 myself an expert in the design of medical carts, 09:12:36

22 given I'm not an engineer. 09:12:40

15

1 Q. And you're not an expert in patent law, 09:12:42

2 correct? 09:12:43

3 A. That is correct. I am not. 09:12:46

4 Q. And it's fair to say you don't really know 09:12:50

5 what the claims of the '668 patent require, right? 09:12:51

6 A. That is correct, no. 09:12:57

7 Q. And also fair to say you don't really know 09:12:59

8 what the claims of the '650 patent require, right? 09:13:01

9 A. Yes, that's correct. 09:13:05

10 Q. I'm going to upload a document to the 09:13:12

11 chat, and I want to ask you a few questions about 09:13:13

12 it. 09:13:15

13 A. Okay. 09:13:18

14 Q. So I've just sent it into the chat. Let 09:13:34

15 me know when you have it open in front of you. 09:13:36

16 A. I have it open. 09:14:08

17 (Exhibit 2018 was previously marked 09:14:09

18 and referred to.) 09:14:09

19 BY MR. JORDAN: 09:14:09

20 Q. You'll see this document is marked as 09:14:12

21 Exhibit 2018 from IPR2023-01274. Do you recognize 09:14:14

22 this document, Mr. Rydingsward? 09:14:20

1	A. Yes, I do.	09:14:23
2	Q. Can you tell me what it is?	09:14:25
3	A. Sure, this is my declaration.	09:14:27
4	Q. Moving forward, I'm going to refer to this	09:14:31
5	document as your declaration or the declaration.	09:14:32
6	You'll know what I'm talking about; is that clear?	09:14:36
7	A. Yes, it is.	09:14:39
8	Q. You mentioned a UL60601 certification in	09:14:47
9	your declaration.	09:14:51
10	Can you please describe to me the testing	09:14:54
11	performed to obtain the UL60601 certification?	09:14:55
12	A. I can tell you what I know about it and	09:15:03
13	kind of how it relates to our products. I doubt I	09:15:08
14	could tell you the exact procedures that are	09:15:12
15	required in the 60601 certification, given that I'm	09:15:16
16	not the engineer that did all the testing. Would	09:15:21
17	that answer what you're looking for?	09:15:24
18	Q. Please tell me what you know about the	09:15:27
19	UL60601 certification.	09:15:29
20	A. Sure.	09:15:32
21	So the 60601 certification is a standard	09:15:33
22	around -- really around safety, and it's about	09:15:38

17

1 building products that meet certain requirements 09:15:43
2 that kind of deem your product. This is often a 09:15:46
3 standard that is considered in healthcare settings. 09:15:52
4 Generally hospitals want to buy product, electronic 09:15:58
5 devices such as medical carts that have these kind 09:16:03
6 of certifications. It involves a lot of different 09:16:06
7 testing standards. One of them is tilt-tip testing 09:16:10
8 where they require your product to be put on a 09:16:19
9 testing device that puts the product at a certain 09:16:22
10 tilt, fills it up with a bunch of weight so that it 09:16:28
11 is in the most opportune position. Essentially the 09:16:33
12 cart is in its highest position, wheels turning the 09:16:36
13 wrong direction, and a certain degree of tilt. And 09:16:40
14 then, you know, what does it take to tip that cart 09:16:43
15 over, so to speak. So that is just one of the tests 09:16:46
16 involved related to stability that's in that 60601 09:16:49
17 certification. 09:16:59
18 There are other requirements within that 09:17:00
19 certification that I'm not entirely clear on, but it 09:17:01
20 relates to the overall, like, electrical safety 09:17:05
21 within the entire system of the cart because there's 09:17:13
22 very different electrical components on there, being 09:17:16

18

1 the power system, the battery, the RUI interface, 09:17:19
2 which is effectively your touch screen, your mobile 09:17:23
3 computing cart. And basically deeming that, you 09:17:26
4 know, all of it is safe, so to speak. So that's 09:17:30
5 kind of what I know about the UL601 standards. It's 09:17:37
6 a -- it's a standard that we as a company -- 09:17:41
7 (Witness' microphone cut out -- court reporter 09:17:56
8 interrupted for clarification.) 09:17:56

9 I was saying the UL60601 requirement is a 09:17:56
10 standard that as a company here at Capsa we kind of 09:18:03
11 subscribe to building most of our products to those 09:18:07
12 standards because we believe that safety requirement 09:18:10
13 is important to the market. 09:18:13

14 Q. Are you familiar with the standard called 09:18:20
15 ES60601? 09:18:21

16 A. ES? I am not, no. 09:18:28

17 Q. Do you know what year the UL60601 09:18:43
18 certification was first published? 09:18:46

19 A. No, I'm afraid I do not know the exact 09:18:56
20 year that it was published. 09:18:58

21 Q. Take a look at paragraph 11 of your 09:19:04
22 declaration, please. Let me know when you're there. 09:19:07

19

A. It is yes. 09:19:27

2 Q. I'm looking at the third sentence, and it 09:19:31

3 says, "I know, firsthand, that customers appreciate 09:19:36

4 and respect and purchase in many instances a Capsa 09:19:41

5 cart over other carts because of the UL60601 09:19:45

```
6 certification."                                09:19:51
```

7 Do you see that sentence, Mr. Rydingsward? 09:19:53

A. I do. 09:19:56

9 Q. What other carts did you mean when you 09:19:57
10 used that term in your declaration? 09:20:00

11	A. I was referring to in general competitive	09:20:08
12	carts in the market that do not have the UL60601	09:20:11
13	certification on that product.	09:20:16

14 Q. Can you name a specific competitor cart 09:20:19
15 that does not have the UL60601 certification that 09:20:23
16 you had in mind when you said this? 09:20:27

17	A. Sure, yeah. So, I mean, Jaco, which is	09:20:30
18	now owned by GCX, is certainly a cart that does not	09:20:39
19	have an entire UL60601 certification. Their cart,	09:20:46
20	that particular one, they are a competitor that I	09:20:52
21	was definitely aware of when thinking about that	09:20:54
22	statement. There is another competitor called	09:20:56

20

1 **Simplifi, which does not have that certification.** 09:21:04

2 **And then as far as Howard medical goes, my** 09:21:12

3 **understanding is that they meet, they claim to meet** 09:21:16

4 **the 60601 certifications, but I'm not aware of them** 09:21:21

5 **actually having the certification.** 09:21:26

6 Q. How do you know that the Jaco carts do not 09:21:34

7 have the certification? 09:21:37

8 A. **It's from firsthand knowledge from** 09:21:43

9 **customers, nor do they promote any of it on any of** 09:21:45

10 **their manuals or spec sheets that I'm aware of.** 09:21:50

11 Q. When you say firsthand knowledge from 09:21:56

12 customers, do you mean that customers tell you that 09:21:58

13 Jaco does not have -- 09:22:01

14 A. **Yes. I'm sorry, I didn't mean to cut you** 09:22:03

15 **off. Go ahead.** 09:22:05

16 Q. When you say firsthand knowledge from 09:22:06

17 customers, do you mean customers tell you that Jaco 09:22:09

18 carts do not have a UL60601 certification? 09:22:12

19 A. **Yes, it has come up in customer** 09:22:17

20 **conversations in the past. That is a point of** 09:22:19

21 **consideration and that Jaco did not offer it.** 09:22:22

22 Q. And how do you know Simplifi carts do not 09:22:27

21

1 have a UL60601 certification? 09:22:30

2 A. Again, it is not published on any of their 09:22:34

3 specifications. We have also heard it from 09:22:36

4 customers they do not have the 60601 certification. 09:22:40

5 Q. Does Capsa spend money on marketing every 09:23:06

6 year? 09:23:09

7 A. Yes. 09:23:14

8 Q. Sorry, I didn't hear the answer. 09:23:20

9 A. Yes, they do. 09:23:23

10 Q. In your declaration, you mentioned Capsa's 09:23:28

11 M38 and Carelink carts. These are medical carts 09:23:31

12 sold by Capsa, right? 09:23:35

13 A. Yes, that is correct, yes. 09:23:37

14 Q. Does Capsa spend money to market the M38 09:23:39

15 cart? 09:23:43

16 A. Yes, they do. 09:23:47

17 Q. Does Capsa spend money to market the 09:23:48

18 Carelink cart? 09:23:52

19 A. Yes, they do. 09:23:54

20 Q. Does Capsa collect customer surveys? 09:24:01

21 A. In certain scenarios it is not a regular 09:24:13

22 practice, but in certain scenarios mostly related to 09:24:15

22

1 service, if a service is performed, we'll send out a 09:24:23

2 customer-related survey saying how was your service. 09:24:31

3 Q. Other than service, does Capsa do other 09:24:36

4 customer surveys? 09:24:41

5 A. Sure, yeah. So when it comes to like 09:24:43

6 product development, customer insights are obtained. 09:24:47

7 I will consult with our top customer, understand 09:24:54

8 basically what the market wants out there from the 09:24:57

9 customer. I don't know that I would call them 09:25:01

10 surveys, but, yeah, we obtain customer insights. 09:25:02

11 Q. Has Capsa conducted surveys from its 09:25:14

12 customers as to what those customers like about the 09:25:16

13 M38 cart? 09:25:18

14 A. Again, we've collected insights, but I 09:25:25

15 would not classify them as surveys. 09:25:28

16 Q. Has Capsa conducted surveys from its 09:25:40

17 customers as to what customers like about the 09:25:42

18 Carelink cart? 09:25:45

19 A. It would be the same answer there, which 09:25:49

20 is we have certainly gathered insights about what 09:25:52

21 they like about the product, but I'm not sure I 09:25:56

22 would classify them as surveys. 09:25:59

23

1 Q. And when you say insight, do you mean a 09:26:06
2 conversation but not a formal survey; is that fair? 09:26:08

3 A. Yeah, yeah, that would be -- that would be 09:26:12
4 fair. That's to the best of my knowledge. There 09:26:14
5 may have been surveys in the past that I'm not aware 09:26:31
6 of back in the Rubbermaid days. 09:26:33

7 Q. Do Capsa's customers purchase the M38 cart 09:26:51
8 only because they have high adjustable compartments? 09:26:55

9 A. Only? No. 09:27:01

10 Q. So there are other reasons that Capsa's 09:27:03
11 customers purchase the M38 cart; is that fair? 09:27:06

12 A. Yes. 09:27:10

13 Q. Can you name one of those reasons? 09:27:12

14 A. Yes, sure. Believe it or not, general 09:27:17
15 aesthetics are important. Is the cart visually 09:27:22
16 appealing and does it look appropriate in a 09:27:26
17 healthcare setting is one particular reason. And 09:27:30
18 then I would say also just there are many -- or 09:27:37
19 different ergonomic features built into a cart that 09:27:44
20 resonate with certain users that are using the cart 09:27:53
21 compared to other features. After ergonomic 09:27:55
22 features, there are certainly a value point that our 09:28:00

24

1 customers consider. 09:28:03

2 Q. Is there a reason why a customer might 09:28:08

3 purchase an M38 cart? 09:28:11

4 A. Any other reasons just in general? Any 09:28:18

5 reasons, yes. There are many -- many reasons they 09:28:20

6 would buy a medical cart. As I mentioned in the 09:28:24

7 past, safety is certainly one of them. Particularly 09:28:27

8 its stability of the carts is always important. As 09:28:35

9 I mentioned earlier, ergonomics are important. So 09:28:40

10 often our users are using these carts both in a 09:28:45

11 standing and seated position, so they need a cart 09:28:48

12 with height adjustment so they could use it standing 09:28:51

13 or sitting. And then just general accessibility to 09:28:57

14 certain features on the cart, you know. What I mean 09:29:04

15 by that is often these carts are being used for 09:29:07

16 medication distribution, so they'll want medication 09:29:10

17 drawers that are typically front mounted, deep, can 09:29:14

18 accommodate all the different kinds of medications 09:29:21

19 that they offer and, you know, easily accessed 09:29:23

20 because generally they are using the cart from the 09:29:26

21 front side of the cart, so many of those features 09:29:30

22 need to be mounted on the cart. 09:29:36

25

1 Q. Do Caspa's customers purchase the Carelink 09:29:47

2 carts only because they have height adjustable 09:29:49

3 compartments? 09:29:53

4 A. No, they do not only because of that. 09:29:59

5 Q. What other reasons do Capsa customers 09:30:01

6 purchase the Carelink carts? 09:30:04

7 A. Sure. I mean, it is all of the reasons 09:30:09

8 that I just previously mentioned about M38. 09:30:11

9 Aesthetics of the M48 cart are different than the 09:30:17

10 M38, so it may be more visually appealing. Then the 09:30:21

11 M48 cart is considered a smart cart platform, so you 09:30:26

12 would notice if you looked at the product, there is 09:30:31

13 actually an onboard touch screen interface on the 09:30:34

14 front of the cart, so basically it's got a built-in 09:30:38

15 computing touch screen and all of the 09:30:42

16 functionalities of the cart are on that touch 09:30:47

17 screen. And then behind the scenes there is also a 09:30:50

18 fleet management software tool that we provide our 09:30:55

19 customers that allows them to manage -- effectively 09:30:59

20 manage their fleet of carts in the hospital, so 09:31:04

21 Carelink gives them that capability. That is 09:31:07

22 certainly a value point with that particular 09:31:10

26

1 **platform.** 09:31:13

2 Q. You mentioned M48. Is M48 and Carelink 09:31:15

3 the same product? 09:31:20

4 A. Yes. I'm sorry. They're interchangeable. 09:31:20

5 **M48 is our internal moniker from an engineering 09:31:24**

6 **perspective on that platform. Carelink is the -- 09:31:27**

7 **what we use to market it because it's the name in 09:31:31**

8 **the market.** 09:31:36

9 Q. It's fair to say you did not provide any 09:31:44
10 sales data in your declaration, right? 09:31:46

11 A. No, I did not. 09:31:51

12 Q. Can you turn to paragraphs 13 and 14 of 09:32:04
13 your declaration, please, and let me know when you 09:32:06
14 are there. 09:32:09

15 A. I am there. 09:32:20

16 Q. In these paragraphs, you describe Capsa 09:32:23
17 carts as having a lower center of gravity and better 09:32:25
18 weight distribution. 09:32:29

19 What are you comparing the Capsa cart to 09:32:32
20 in those statements? 09:32:35

21 A. Again, it's a general statement when I 09:32:38
22 think about our competitive -- all of our 09:32:40

27

1 competitors in the market. So not specific one 09:32:44
2 particular competitor but a general statement that 09:32:50
3 our carts are generally more stable because of the 09:32:57
4 way they are designed. 09:33:00

5 Q. Are you saying Capsa carts have a lower 09:33:18
6 center of gravity than competitor carts generally? 09:33:20

7 A. Yes, I'm saying when you compare the Capsa 09:33:29
8 carts to other carts on the market, the way that 09:33:32
9 they are designed with the center column being 09:33:38
10 mounted at the rear of the cart, then the base, the 09:33:41
11 front wheels kind of protruding forward, as well as 09:33:46
12 any sort of medication compartments that they order, 09:33:51
13 carts with medication compartments extending 09:33:54
14 forward, the way that it is designed, it is 09:33:56
15 generally more stable in our experience from other 09:34:01
16 carts on the market. 09:34:06

17 Q. Back to the cart described in the '668 09:34:27
18 patent, can you identify where the center of gravity 09:34:30
19 is in the invention in the '668 patent? 09:34:34

20 A. I'm not exactly sure I could specify 09:34:42
21 exactly where it is since I'm not an engineer, but I 09:34:44
22 could give you kind of the logic of it, which is 09:34:49

28

1 generally the weight is more distributed over the 09:34:53
2 center of the column, which is mounted at the back 09:34:57
3 of the cart, and then it's more supported by the 09:35:01
4 front mounted -- not front mounted -- but the front 09:35:07
5 legs of the base. But as far as an exact location, 09:35:13
6 again, I'm not an engineer. I couldn't show you 09:35:17
7 exactly where the center of gravity is. 09:35:21

8 Q. Mr. Rydingsward, have you reviewed any of 09:35:26
9 the prior art references that the petitioner asserts 09:35:28
10 in this proceeding? 09:35:32

11 A. Yeah, I did briefly review some of the 09:35:36
12 visuals, yes. 09:35:39

13 Q. Would you take a look at paragraph 16 of 09:36:16
14 your dec? 09:36:18

15 A. Yes, I've got it. 09:36:32

16 Q. Here you write, "By having better weight 09:36:37
17 distribution and a lower center of gravity, the 09:36:39
18 medical carts are less prone to tip when pushed 09:36:41
19 across a floor or a threshold." 09:36:44

20 Is it fair to say you do not have a 09:36:48
21 specific competitor cart in mind when you made this 09:36:49
22 statement? 09:36:54

29

1 A. I don't know that I would classify it as 09:36:59
2 fair to say I didn't have a specific. I had many 09:37:01
3 competitors in mind when I was thinking about this, 09:37:05
4 so, yeah. I mean, there were -- there were multiple 09:37:12
5 competitors that I know not to be as stable as our 09:37:16
6 carts out there from firsthand experience. 09:37:18

7 Q. Can you name those competitor carts, 09:37:28
8 please? 09:37:30

9 A. Sure. In my experience, again, the Jaco 09:37:32
10 cart is not as stable. The FLO -- formerly FLO, 09:37:34
11 TouchPoint cart is not as stable. The PowerCart in 09:37:44
12 my experience is not as stable. The Ergotron cart 09:37:50
13 in my experience is not as stable. And even the 09:37:59
14 Enovate, former, their Envoy series, because I 09:38:07
15 haven't used that cart as much, but the former 09:38:12
16 series cart is not as stable. 09:38:15

17 Q. Have you tested any of those competitor 09:38:24
18 carts for stability? 09:38:25

19 A. When you say tested, what do you mean by 09:38:34
20 tested? Have I used them? Yes. 09:38:36

21 Q. Have you performed any engineering 09:38:40
22 stability tests on any of your competitor carts? 09:38:42

30

1 A. I have personally not, no. 09:38:46

2 Q. Has Capsa performed them? 09:38:48

3 A. My understanding is in the past, they have 09:38:52
4 tested the carts. The level of testing, I'm not 09:38:55
5 exactly sure what was involved. 09:39:00

6	Q. Can you tell me if the Capsa M38 cart is	09:39:25
7	the original Rubbermaid design described in the '668	09:39:30
8	patent?	09:39:35

9 MR. KWAK: Objection, form. 09:39:39

10	A. Yeah, so I believe I could tell -- I could	09:39:49
11	tell you what I know. The M38 was designed off of	09:39:53
12	-- it was designed off a precursor model, which was	09:40:04
13	our M29 and 39 carts, which were the original carts	09:40:08
14	that we came to market with in the 2003 time frame,	09:40:13
15	and this was the next generation cart launched using	09:40:23
16	the same kind of design concepts that were on the	09:40:28
17	prior platform. So, yes, the patents were certainly	09:40:31
18	a component during the design of the M38 carts.	09:40:38

19 Q. Can you describe any changes in the design 09:40:48
20 of the M38 compared to the M29, 39 model you just 09:40:50
21 mentioned? 09:40:56

22 A. They were mostly aesthetic changes. The 09:40:58

1 function was very similar. It was still the same 09:41:00
2 kind of a design concept with a rear-mounted column 09:41:07
3 and then the forward-boarding base, but overall the 09:41:11
4 whole aesthetics of the cart changed. We really 09:41:17
5 kind of did what we thought the market wanted from 09:41:23
6 an aesthetics point at that time. 09:41:25

7 And like new, like, accessories were 09:41:37
8 offered that worked with the M38 platform, different 09:41:41
9 baskets and bar scan scanner holders. There were a 09:41:44
10 whole line of accessories that worked on that 09:41:47
11 platform of carts. 09:41:51

12 Q. Do you know if the M38 cart uses drawer 09:42:00
13 slides in its height adjustment mechanism? 09:42:02

14 A. Drawer slides in the height adjustment 09:42:12
15 mechanism. I don't believe that's an accurate 09:42:15
16 statement. From my understanding -- go ahead. 09:42:17

17 Q. How about the Carelink cart, does it use 09:42:24
18 drawer slides in its height adjustment mechanism? 09:42:26

19 A. I'm afraid I can't answer that. I don't 09:42:33
20 know. The word drawer slides is not something I'm 09:42:34
21 familiar with being involved in the actual height 09:42:42
22 adjustment mechanism. Drawer slides are something 09:42:45

32

1 **that's in the medication box of the cart, which is** 09:42:48
2 **then integrated into the height adjustment mechanism** 09:42:54
3 **in the back of the cart.** 09:42:57

4 Q. The drawer slides that are in the 09:43:12
5 medication box of the Carelink cart, those are not 09:43:14
6 used as part of a sliding mechanism for the height 09:43:18
7 adjustment mechanism to go up and down. Is that 09:43:21
8 right? 09:43:25

9 A. **I don't think that's accurate. I think** 09:43:28
10 **somehow the drawer slide -- I don't -- I guess I** 09:43:29
11 **would have to understand what you mean by drawer** 09:43:34
12 **slides. I don't know how we're defining drawer** 09:43:37
13 **slides. Maybe that's something in the patent** 09:43:42
14 **language that I'm just not familiar with.** 09:43:47

15 Q. Does Capsa's M38 cart have a curved work 09:43:56
16 surface? 09:44:00

17 MR. KWAK: Objection, form. 09:44:02

18 A. **So the M38 work surface, it does have a** 09:44:10
19 **curved form to the front of the work surface in the** 09:44:14
20 **back.** 09:44:21

21 Q. Does the Carelink cart have a curved work 09:44:30
22 surface? 09:44:33

33

1 MR. KWAK: Objection, form. 09:44:34

2 A. It has a portion of the work surface as 09:44:42

3 well that is curved in the front area of the work 09:44:44

4 surface. 09:44:57

5 Q. Mr. Rydingsward, I'm going to put another 09:45:10

6 document in the chat. Open that, please, and let me 09:45:12

7 know when you have it available. 09:45:38

8 A. Okay, I have it up. 09:46:20

9 Q. You'll see in the top left of this 09:46:21

10 document, there's a title that says, Computing 09:46:23

11 carts, M38e." I'm going to refer to this document 09:46:27

12 as Exhibit 1041. 09:46:30

13 (Exhibit 1041 was marked for 09:46:37

14 identification and attached to the deposition 09:46:37

15 transcript.) 09:46:37

16 BY MR. JORDAN: 09:46:37

17 Q. Mr. Rydingsward, do you recognize this 09:46:37

18 document? 09:46:38

19 A. Yes, I do. 09:46:39

20 Q. Can you tell me what it is, please? 09:46:41

21 A. Sure. Yes, this is our M38 evolved 09:46:45

22 platform is kind of what the E stands for. This was 09:46:51

1 **a modification of the original M38 cart platform I** 09:46:57

2 **guess we launched back in 2003.** 09:47:03

3 Q. Does Capsa sell this product today? 09:47:14

4 A. **Yes, we do, yes.** 09:47:20

5 Q. Would you look at page 2 of the document, 09:47:24

6 please. 09:47:26

7 A. **Yes.** 09:47:34

8 Q. And at the bottom left, there are a series 09:47:35

9 of model options. And on the furthest one on the 09:47:36

10 left, there is a model option called "Document 09:47:41

11 model." Do you see that one? 09:47:44

12 A. **I do, yes.** 09:47:46

13 Q. So the M38e Document model cart does not 09:47:50

14 have compartments, right? 09:47:54

15 A. **On that particular configuration, yes,** 09:47:59

16 **that's correct, it does not have drawers.** 09:48:01

17 Q. Does the M38e Document model meet UL60601 09:48:06

18 standard? 09:48:11

19 A. **Yes, it is part of an overall platform** 09:48:15

20 **that meets the UL60601 standards, the platform being** 09:48:17

21 **the M38.** 09:48:27

22 Q. Do you know if the base of the M38e 09:48:44

35

1 Document model is different than the base of the 09:48:47
2 other M38 models shown on page 2 of this Document? 09:48:50

3 **A. I do, yes. It is the same base.** 09:48:59

4 Q. Is the height of the M38e Document model 09:49:02
5 different than the height of the other M38 models 09:49:05
6 listed on this sheet? 09:49:08

7 **A. No. The standard configuration uses the** 09:49:12
8 **exact same casters, so it is the same height.** 09:49:17

9 Q. Other than the presence of the drawers, 09:49:28
10 can you describe any differences between the M38e 09:49:31
11 Document model and the other models listed on this 09:49:34
12 data sheet? 09:49:37

13 **A. Sure. Yeah, the difference from -- say** 09:49:41
14 **that question one more time, if you could, Dan.** 09:49:49

15 Q. Other than the presence of the drawers, 09:49:58
16 can you describe any differences between the M38e 09:49:59
17 Document model and the other models listed on this 09:50:02
18 data sheet? 09:50:06

19 **A. Yeah. So there's really no significant** 09:50:12
20 **differences aside from the Document model has a** 09:50:15
21 **different RUI is what we call it. It's a user** 09:50:21
22 **interface that is integrated into the work surface** 09:50:27

36

1 of the cart, and all of the documents -- all of the 09:50:30
2 carts that have medication bins or drawers on them 09:50:38
3 that are electronic locking, they would have a pin 09:50:40
4 code, that RUI interface on the work surface. That 09:50:46
5 pin code is your pin code to gain access to those 09:50:50
6 electronic locking drawers. So the Document model 09:50:53
7 has the same size RUI. It doesn't have the same -- 09:51:04
8 it doesn't have the numbered pin code pad on the RUI 09:51:30
9 like the drawer carts do. 09:51:36

10 Q. All right, Mr. Rydingsward. I'm going to 09:52:05
11 ask you to take that document down and I'm going to 09:52:07
12 put a new document in the chat. Please open that up 09:52:09
13 and let me know when you have it in front of you. 09:52:37

14 A. I have it open. 09:52:53

15 Q. You'll see on the top left, this document 09:52:56
16 has a title that says "Mobile Nurse Station 09:52:58
17 Carelink." I'm going to refer to this document as 09:53:02
18 Exhibit 1042. 09:53:06

19 (Exhibit 1042 was marked for 09:53:08
20 identification and attached to the deposition 09:53:08
21 transcript.) 09:53:08
22

37

1 BY MR. JORDAN: 09:53:10

2 Q. Do you recognize this document, 09:53:10

3 Mr. Rydingsward? 09:53:12

4 A. I do, yes. 09:53:14

5 Q. Can you tell me what it is, please? 09:53:16

6 A. Sure. This is the customer-facing 09:53:19

7 marketing brochure for the Carelink cart. 09:53:23

8 Q. Is this the same Carelink cart that you 09:53:31

9 described in your declaration? 09:53:33

10 A. It is, yes. 09:53:36

11 Q. Can you go to page 2 of this document, 09:53:39

12 please. 09:53:41

13 A. Yes, I'm there. 09:53:47

14 Q. And at the bottom left, do you see there 09:53:48

15 is a model option Carelink Document model? Do you 09:53:50

16 see that? 09:53:54

17 The Carelink Document model cart does not 09:53:54

18 have compartments, right? 09:53:57

19 A. Correct, yes. 09:54:00

20 Q. Does the Carelink Document model without 09:54:03

21 compartments meet UL60601? 09:54:06

22 A. Again, it's the entire platform of 09:54:11

39

1 code could be used to log into the cart. Or if you 09:55:32
2 have drawers, they could be -- so there is no 09:55:34
3 difference. 09:55:41

4 (Witness' Microphone cut out - Court Reporter 09:55:41
5 interrupted for clarification.) 09:55:41

6 I was just saying there could be -- it's 09:56:02
7 the same. The models are the same. There is no 09:56:05
8 difference aside from the locking drawer modules. 09:56:07

9 Q. All right, Mr. Rydingsward. It is okay to 09:56:20
10 put this document away. I'm going to introduce 09:56:22
11 another document into the chat. 09:56:24

12 A. Okay. 09:56:28

13 Q. Please let me know when you have the new 09:56:48
14 document open in front of you. 09:56:50

15 A. Okay. 09:57:22

16 Q. On the first page you'll see a title that 09:57:23
17 says, "Capsa Healthcare SlimCart Assembly and 09:57:25
18 Operating Manual." I'm going to refer to this 09:57:28
19 Document as Exhibit 1043. 09:57:30

20 (Exhibit 1043 was marked for 09:57:34
21 identification and attached to the deposition 09:57:34
22 transcript.) 09:57:34

40

1 BY MR. JORDAN: 09:57:34

2 Q. Mr. Rydingsward, do you recognize this 09:57:35
3 document? 09:57:36

4 A. Yes, this looks like -- yes, so this is 09:57:43
5 our assembly and operating manual, yes. 09:57:47

6 Q. That's an assembly and operating manual 09:57:53
7 for this product called the SlimCart; is that right? 09:57:55

8 A. That's correct, yes. 09:57:58

9 Q. Can you turn to page 5 of this document, 09:58:03
10 please. 09:58:05

11 A. Okay. 09:58:20

12 Q. On page 5, you'll see what looks like 09:58:22
13 three different configurations of this product, a 09:58:25
14 monitor configuration, a tablet configuration, and a 09:58:29
15 laptop configuration. 09:58:33

16 Do you see the page I'm talking about? 09:58:34

17 A. Yes, I do. 09:58:37

18 Q. What can you tell me about the different 09:58:41
19 configurations of Capsa's SlimCart shown on page 5? 09:58:43

20 A. So the -- hold on. Let me look. 5. 09:58:56

21 So basically what we're trying to display, 09:59:03
22 these two, page 5 and 6, the two configuration 09:59:10

41

1 options, showing the basic laptop model that does 09:59:17
2 not have any storage drawers and then one that does 09:59:21
3 have up to two drawers mounted on it. We're also 09:59:27
4 showing that you could use it in a variety of -- 09:59:35
5 with a variety of different technology computing 09:59:39
6 devices, so a laptop, a tablet, or a monitor. 09:59:43

7 Q. The product with up to two drawers, that's 09:59:52
8 the monitor configuration; is that right? 09:59:54

9 A. That's correct, yes. 09:59:58

10 Q. Can you tell me if the Capsa SlimCart 10:00:05
11 monitor configuration compartment is mounted on top 10:00:08
12 of the height adjustment mechanism in that cart? 10:00:12

13 A. Yes, it is mounted on top of the height 10:00:18
14 adjustment mechanism. 10:00:21

15 Q. Does the SlimCart product meet UL60601? 10:00:26

16 A. Yes, it does. It meets it. It's an 10:00:34
17 important designation. It meets the standards based 10:00:41
18 on certain weight requirements, which is displayed 10:00:45
19 on page 6. If you add more weight than that, it 10:00:49
20 will not pass the 60601 requirements for stability. 10:00:55

21 Q. Can you turn to page 17 of this document, 10:01:18
22 please. Let me know when you're there. 10:01:20

42

A. Okay. 10:01:39

2 Q. This page 17 shows the drawer of the 10:01:40

3 SlimCart; is that right? 10:01:42

4 A. Yes, it looks like that, yeah. 10:01:46

5 Q. Would you agree that the height adjustment 10:01:55

6 mechanism protrudes through a notch in the drawer 10:01:57

7 housing at the bottom -- or a hole in the drawer 10:02:00

8 housing at the bottom of sheet 16? Scratch that. 10:02:04

9 Let me ask a different question. 10:02:09

10 Are you ready for a new question? 10:02:10

A. Yes.

12 Q. Looking at the drawer picture in the 10:02:21

13 middle of the page, it's fair to say the drawer has 10:02:23

14 a notch shape in its rear side that accommodates the 10:02:26

15 height adjustment mechanism, right? 10:02:30

16 **A.** Yes, that's right. 10:02:32

17 Q. And the drawer in the SlimCart is 10:02:35

```
18    functional, right?                                10:02:37
```

A. What do you mean by functional? 10:02:41

20 Q. It works for its intended purpose, to hold 10:02:44

```
21 items, right? 10:02:47
```

22 **A.** Yes, yes. 10:02:48

43

1 Q. This picture shows it's not impossible for 10:02:51
2 a drawer to extend around the side of the height 10:02:53
3 adjustment mechanism, right? 10:02:58

4 A. Yes. 10:03:00

5 Q. And a user can access things placed in the 10:03:01
6 drawer of the SlimCart, right? 10:03:04

7 A. Yes. 10:03:07

8 Q. All right. Mr. Rydingsward, you can take 10:03:36
9 that document down. I want to go back to your 10:03:38
10 declaration in paragraph 18. Let me know when you 10:03:49
11 have that up in front of you. 10:03:54

12 A. Paragraph 18 you said? 10:04:16

13 Q. That's right. 10:04:17

14 Q. In paragraph 18 of your declaration, you 10:04:34
15 state that "Capsa copied Rubbermaid's patented 10:04:36
16 features of the '668 and '650 patent." 10:04:40

17 It's fair to say Capsa did not invent the 10:04:44
18 '668 or '650 patent, right? 10:04:46

19 A. Correct, yeah. 10:04:52

20 Q. Capsa was sued for infringement of the 10:04:53
21 '650 patent; is that right? 10:04:56

22 A. That's my understanding, yes. 10:04:59

44

1 Q. Did you understand that Capsa infringed 10:05:02
2 the '650 patent? 10:05:03

3 A. My understanding was that -- I was not 10:05:09
4 involved in the case at the time. My understanding 10:05:10
5 was that they infringed upon Rubbermaid patents. I 10:05:13
6 know they were sued because of that. At the time 10:05:22
7 when I became aware of it, I was not aware of what 10:05:24
8 patents were being infringed. 10:05:27

9 Q. Back to your time at Rubbermaid, are you 10:05:36
10 familiar with any failed attempts by Rubbermaid to 10:05:37
11 develop a cart with compartments located in the 10:05:41
12 forward portion of a work platform that were height 10:05:44
13 adjustable? 10:05:46

14 A. Failed attempts. Can you expound on what 10:05:51
15 you mean by failed attempts? 10:05:56

16 Q. I mean, are you familiar with any -- any 10:05:58
17 attempts by Rubbermaid's engineering department to 10:06:00
18 come up with a cart with compartments located in the 10:06:03
19 forward portion of the work platform that were 10:06:06
20 unsuccessful? 10:06:08

21 A. No, not that I'm aware of. The 10:06:15
22 engineering team is always designing and doing 10:06:20

45

1 things that aren't necessarily brought to market. 10:06:24

2 I'm not specifically aware of anything that was 10:06:26

3 designed and then not -- not brought forward to 10:06:31

4 market. 10:06:36

5 Q. Are you familiar with anyone at Rubbermaid 10:06:42

6 expressing skepticism that they could not develop a 10:06:44

7 cart with compartments located in the forward 10:06:48

8 portion of the work platform that are height 10:06:50

9 adjustable? 10:06:53

10 A. No, I'm not aware of anyone. 10:06:54

11 MR. JORDAN: All right. 10:07:19

12 Mr. Rydingsward, we've been going about an hour on 10:07:19

13 the record, so I would like to take a ten-minute 10:07:21

14 break right now, and we'll come back at 10:17. 10:07:24

15 Would that be all right? 10:07:28

16 THE WITNESS: Sure, that's fine. 10:07:32

17 (A brief recess was taken.) 10:07:43

18 BY MR. JORDAN: 10:19:03

19 Q. I'm going to put another document in the 10:19:04

20 chat here for you. Please let me know when you have 10:19:05

21 that open. 10:19:27

22 A. Okay. 10:19:47

46

1 Q. You'll see at the top of this document is 10:19:47
2 a logo for GCX Healthcare Solutions, and it lists a 10:19:49
3 part number for a Jaco cart, EVO-20-HS-NB. I'm 10:19:54
4 going to refer to this Document as Exhibit 1044. 10:20:00

5 (Exhibit 1044 was marked for 10:20:03
6 identification and attached to the deposition 10:20:03
7 transcript.) 10:20:03

8 A. Okay. 10:20:07

9 Q. Do you recognize this document, 10:20:08
10 Mr. Rydingsward? 10:20:09

11 A. Not this specific one. It has been 10:20:15
12 rebranded since GCX acquired Jaco. Yes, I have 10:20:19
13 reviewed very similar documents in the past. 10:20:25

14 Q. Earlier during the examination today, you 10:20:29
15 referenced Jaco carts and certain stability factors 10:20:31
16 with them. Was this -- is this the cart you were 10:20:35
17 mentioning when you testified earlier today? 10:20:38

18 A. Yes. This, yes, among former models that 10:20:45
19 have been since discontinued. 10:20:50

20 MR. JORDAN: Okay, you can take this 10:21:03
21 document now. 10:21:04

22 I have no further questions for you 10:21:08

47

1 today at this time, Mr. Rydingsward. I'll turn 10:21:09

2 things over to your counsel. 10:21:12

3 MR. KWAK: I do not have any 10:21:15

4 redirect, but we would like to have the witness 10:21:16

5 review and sign. 10:21:18

6 MR. JORDAN: Okay. 10:21:25

7 10:21:32

8 (Signature having not been waived,

9 the deposition of Craig Rydingsward was concluded

10 at 10:21 a.m.)

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I, CRAIG RYDINGSWARD, do hereby certify

11

under penalty of perjury that I have read the

12

foregoing transcript of my deposition taken on

13

August 1, 2024; that I have made such corrections as

14

appear noted herein in ink, initialed by me; that my

15

testimony as contained herein, as corrected, is true

16

and correct.

17

18

19

Signature: _____

20

21

Dated: _____

22

1 C E R T I F I C A T E

2

3 COMMONWEALTH OF VIRGINIA:

4 I, MICHELE EDDY, shorthand reporter,
5 do hereby certify that the witness whose
6 deposition is hereinbefore set forth was duly
7 sworn, and that such deposition is a true,
8 correct, and full record of the testimony
9 given.

10 I further certify that I am not related
11 to any of the parties to this action by blood or
12 by marriage, and that I am in no way interested
13 in the outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand this 4th day of August, 2024.

16

17 Michelle E. Eddy

18 MICHELE E. EDDY, Shorthand Reporter

19 My Commission Expires May 31, 2029

20

21

22

1 NAME OF CASE: Howard Industries Inc. V. Capsa

2 DATE OF DEPOSITION: August 1, 2024

3 1. To clarify the record.

4 2. To conform to the facts.

5 3. To correct transcription error.

6 Page _____ Line _____ Reason _____

7 From _____ to _____

8 Page _____ Line _____ Reason _____

9 From _____ to _____

10 Page _____ Line _____ Reason _____

11 From _____ to _____

12 Page _____ Line _____ Reason _____

13 From _____ to _____

14 Page _____ Line _____ Reason _____

15 From _____ to _____

16 Page _____ Line _____ Reason _____

17 From _____ to _____

18 _____

19 CRAIG RYDINGSWARD

20 SUBSCRIBED AND SWORN TO BEFORE ME
21 THIS _____ DAY OF _____, 2024.

22 _____
(Notary Public) My Commission expires: _____

A	31:19	August 1:19	9:20 12:11	21:17,20
a.m 1:20 6:3	agree 42:5	6:2 48:13	18:12 23:14	22:3,11,16
47:10	ahead 20:15	49:15 50:2	30:10 31:15	25:5 26:16
above-entitled	31:16	auto 12:21	best 23:4	26:19 27:5,7
2:6	allows 25:19	available 33:7	better 26:17	30:2,6 34:3
access 36:5	AMT 12:17	aware 12:1	28:16	39:17 41:10
43:5	13:14,18,20	19:21 20:4	bins 36:2	43:15,17,20
accessability	13:21	20:10 23:5	38:21	44:1 50:1
24:13	answer 6:21	44:7,7,21	bit 10:13	Capsa's 21:10
accessed	7:9,11,21	45:2,10	blood 49:11	23:7,10
24:19	14:18 16:17		BOARD 1:3	32:15 40:19
accessories	21:8 22:19	B	bottom 34:8	care 6:13,14
31:7,10	31:19	B 5:7	37:14 42:7,8	10:18,18
accommodate	APPEAL 1:3	back 14:1 23:6	box 32:1,5	Carelink 5:12
24:18	appealing	27:17 28:2	break 7:19,20	21:11,18
accommoda...	23:16 25:10	32:3,20 34:2	7:22 45:14	22:18 25:1,6
42:14	appear 48:14	43:9 44:9	brief 45:17	25:21 26:2,6
accurate 31:15	applications	45:14	briefly 28:11	31:17 32:5
32:9	8:8	background	brochure 37:7	32:21 36:17
acquired 11:2	appreciate	10:14	brought 45:1,3	37:7,8,15,17
11:3,5 46:12	19:3	bar 31:9	building 17:1	37:20 38:1,3
action 49:11	appropriate	barcode 12:22	18:11	38:4,7,8,12
actual 31:21	23:16	13:5,13	built 23:19	38:14
acute 6:13	Approximat...	barcode-rel...	built-in 25:14	cart 5:17 11:5
10:18	9:11	13:2,3,8	bunch 17:10	12:13 13:10
add 41:19	area 33:3	Barnett 4:12	business 11:5	13:11 17:12
adjustable	art 14:8,15	base 27:10	14:3	17:14,21
23:8 25:2	28:9	28:5 31:3	buy 17:4 24:6	18:3 19:5,14
44:13 45:9	aside 35:20	34:22 35:1,3		19:18,19
adjustment	38:16 39:8	38:2,3	C	21:15,18
24:12 31:13	asked 6:20	based 41:17	C 3:1 6:1 49:1	22:13,18
31:14,18,22	38:11	basic 41:1	49:1	23:7,11,15
32:2,7 41:12	assembly 5:14	basically	call 22:9 35:21	23:19,20
41:14 42:5	39:17 40:5,6	12:18 18:3	called 2:5	24:3,6,11,14
42:15 43:3	asserts 28:9	22:8 25:14	12:17 18:14	24:20,21,22
administrati...	assume 6:22	40:21	19:22 34:10	25:9,11,11
14:3	attached 5:8	baskets 31:9	40:7	25:14,16
advance 9:3	33:14 36:20	battery 18:1	capability	26:19 27:10
aesthetic	39:21 46:6	bedside 13:10	25:21	27:17 28:3
30:22	attempts	beginning	Capsa 1:8 5:10	28:21 29:10
aesthetics	44:10,14,15	9:20	10:15,22	29:11,12,15
23:15 25:9	44:17	BEHALF 3:3	11:1,1,3,4	29:16 30:6
31:4,6	ATTENDANCE	4:3	18:10 19:4	30:15 31:4
afraid 18:19	4:1	believe 9:13	21:5,12,14	31:12,17

32:1,3,5,15 32:21 34:1 34:13 36:1 37:7,8,17 39:1 41:12 44:11,18 45:7 46:3,16 carts 5:10 13:4 13:6,17,21 14:9,16,21 17:5 19:5,9 19:12 20:6 20:18,22 21:11,11 24:8,10,15 25:2,6,20 26:17 27:3,5 27:6,8,8,13 27:16 28:18 29:6,7,18,22 30:4,13,13 30:18 31:11 33:11 36:2,9 46:15 case 44:4 50:1 Caspa's 25:1 casters 35:8 center 26:17 27:6,9,18 28:2,7,17 certain 17:1,9 17:13 21:21 21:22 23:20 24:14 41:18 46:15 certainly 12:15 19:18 22:20 23:22 24:7 25:22 30:17 certification 16:8,11,15 16:19,21 17:17,19 18:18 19:6	19:13,15,19 20:1,5,7,18 21:1,4 certifications 17:6 20:4 certify 48:10 49:5,10 changed 31:4 changes 30:19 30:22 chat 15:11,14 33:6 36:12 39:11 45:20 claim 20:3 claims 10:3,5 10:8,10,11 10:12 15:5,8 clarification 18:8 39:5 clarify 50:3 classify 22:15 22:22 29:1 clear 7:9 16:6 17:19 Client 8:11 code 36:4,5,5 36:8 38:22 39:1 collect 21:20 collected 22:14 college 12:4,7 12:13,15,18 14:1 column 27:9 28:2 31:2 come 20:19 44:18 45:14 comes 22:5 comment 14:11,12 Commission 49:19 50:22 Commonwe...	2:9 49:3 communicat... 7:16 company 12:17 18:6 18:10 compare 27:7 compared 23:21 30:20 comparing 26:19 compartment 41:11 compartmen... 23:8 25:3 27:12,13 34:14 37:18 37:21 44:11 44:18 45:7 competitive 19:11 26:22 competitor 19:14,20,22 27:2,6 28:21 29:7,17,22 competitors 27:1 29:3,5 component 30:18 components 17:22 computer 8:9 computing 5:10 18:3 25:15 33:10 41:5 concept 31:2 concepts 30:16 concluded 47:9 conducted 22:11,16 configuration	34:15 35:7 40:14,14,15 40:22 41:8 41:11 configuratio... 40:13,19 conform 50:4 consider 14:7 14:14,20 24:1 consideration 20:21 considered 17:3 25:11 consult 9:8 22:7 consulted 9:5 9:14 contained 48:15 Continued 4:1 conversation 23:2 conversations 20:20 copied 43:15 correct 14:6 15:2,3,6,9 21:13 34:16 37:19 40:8 41:9 43:19 48:16 49:8 50:5 corrected 48:15 corrections 48:13 counsel 2:5 6:7 9:7 47:2 court 7:5 18:7 39:4 Craig 1:18 2:4 5:3,21 6:5,11 47:9 48:10	50:19 CRR 2:8 curved 32:15 32:19,21 33:3 customer 20:19 21:20 22:4,6,7,9,10 24:2 customer-fa... 37:6 customer-re... 22:2 customers 19:3 20:9,12 20:12,17,17 21:4 22:12 22:12,17,17 23:7,11 24:1 25:1,5,19 cut 18:7 20:14 39:4
D				
D 6:1 Dan 14:13 35:14 dan.jordan... 3:12 DANIEL 3:4 data 26:10 35:12,18 DATE 50:2 Dated 48:21 day 49:15 50:20 Daylight 1:20 days 23:6 DeAnna 4:12 dec 28:14 declaration 5:21 16:3,5,5 16:9 18:22 19:10 21:10				

26:10,13 37:9 43:10 43:14 deem 17:2 deeming 18:3 deep 24:17 defining 32:12 definitely 19:21 degree 12:5 14:1,2,5 17:13 delivering 11:15 13:12 department 44:17 deposed 6:15 deposition 2:4 5:9 7:4 9:1,4 9:9,12 33:14 36:20 39:21 46:6 47:9 48:12 49:6,7 50:2 describe 10:15 16:10 26:16 30:19 35:10 35:16 38:13 described 27:17 30:7 37:9 design 14:8,15 14:21 30:7 30:16,18,19 31:2 designation 41:17 designed 27:4 27:9,14 30:11,12 45:3 designing 44:22 develop 44:11	45:6 development 22:6 device 17:9 devices 17:5 41:6 difference 35:13 38:17 39:3,8 differences 35:10,16,20 38:13 different 13:2 13:8 17:6,22 23:19 24:18 25:9 31:8 35:1,5,21 40:13,18 41:5 42:9 direction 17:13 Director 11:8 11:11 directors 10:19 discontinued 46:19 discuss 8:14 discussions 9:7 display 40:21 displayed 41:18 distributed 28:1 distribution 24:16 26:18 28:17 divided 11:9 division 6:14 11:9,10,12 11:14,16 divisions 10:18	document 15:10,20,22 16:5 33:6,10 33:11,18 34:5,10,13 34:17 35:1,2 35:4,11,17 35:20 36:6 36:11,12,15 36:17 37:2 37:11,15,17 37:20 38:3,7 38:8,14 39:10,11,14 39:19 40:3,9 41:21 43:9 45:19 46:1,4 46:9,21 Documentat... 38:22 documents 8:6 9:3,5 36:1 46:13 doing 44:22 doubt 16:13 drawer 31:12 31:14,18,20 31:22 32:4 32:10,11,12 36:9 39:8 42:2,6,7,12 42:13,17 43:2,6 drawers 24:17 34:16 35:9 35:15 36:2,6 38:12,16 39:2 41:2,3,7 Drive 4:6 Dublin 4:7 duly 2:7 6:6 49:6 Dunner 3:8 duties 11:11	E E 3:1,1 5:7 6:1 6:1 33:22 49:1,1,18 earlier 24:9 46:14,17 easily 24:19 east 11:9 Eastern 1:20 11:9,10,12 11:14,15 EDDY 2:8 49:4 49:18 effectively 10:20 18:2 25:19 EHR 5:17 electrical 17:20,22 electronic 17:4 36:3,6 engineer 14:22 16:16 27:21 28:6 engineering 14:5 26:5 29:21 44:17 44:22 Enovate 29:14 entail 11:11 entire 10:19 17:21 19:19 37:22 entirely 17:19 entirety 9:16 Envoy 29:14 ergonomic 23:19,21 ergonomics 24:9 Ergotron 29:12 error 50:5 ES 18:16	ES60601 18:15 ESQUIRE 3:4 3:5,6 4:4 Essentially 17:11 EVO-20-HS-... 5:17 46:3 evolved 33:21 exact 16:14 18:19 28:5 35:8 exactly 10:10 27:20,21 28:7 30:5 examination 1:17 2:5 5:4 6:7 46:14 excuse 10:9 Exhibit 5:10 5:12,14,16 5:21 15:17 15:21 33:12 33:13 36:18 36:19 39:19 39:20 46:4,5 experience 10:14 27:15 29:6,9,12,13 expert 14:21 15:1 expires 49:19 50:22 Explorer 3:9 expound 44:14 expressing 45:6 extend 43:2 extended 6:14 10:18 extending 27:13 F
---	---	---	--	--

F 49:1	formal 23:2	24:20 27:3,6	39:17 46:2	INDEX 5:1
factors 46:15	former 29:14	27:15 28:1	hear 13:6 21:8	Industries 1:5
facts 50:4	29:15 46:18	generation	heard 21:3	50:1
failed 44:10,14	formerly 29:10	30:15	height 24:12	industry 12:13
44:15	forth 49:6	give 27:22	25:2 31:13	Information
fair 14:4 15:4,7	forward 16:4	given 14:22	31:14,18,21	5:11,13,18
23:2,4,11	27:11,14	16:15 49:9	32:2,6 35:4,5	infringed 44:1
26:9 28:20	44:12,19	gives 25:21	35:8 38:6,7	44:5,8
29:2 38:2,6	45:3,7	go 6:17 20:15	41:12,13	infringement
42:13 43:17	forward-boa...	31:16 32:7	42:5,15 43:2	43:20
familiar 10:3,8	31:3	37:11 43:9	44:12 45:8	initialed 48:14
10:9,10	frame 30:14	goes 20:2	Henderson 3:7	ink 48:14
11:17,21	front 15:15	going 6:22	hereinbefore	innovate 38:18
18:14 31:21	24:17,21	8:19 15:10	49:6	insight 23:1
32:14 44:10	25:14 27:11	16:4 33:5,11	hereunto	insights 22:6
44:16 45:5	28:4,4,4	36:10,11,17	49:14	22:10,14,20
far 20:2 28:5	32:19 33:3	39:10,18	high 23:8	instances 19:4
Farabow 3:7	36:13 39:14	45:12,19	highest 17:12	integrated
features 23:19	43:11	46:4	hold 40:20	32:2 35:22
23:21,22	full 49:8	good 6:9 8:2	42:20	38:18
24:14,21	function 31:1	gradation	holders 31:9	intended
38:20 43:16	functional	12:19,20	hole 42:7	42:20
fills 17:10	42:18,19	graduate 12:7	hospital 25:20	interchange...
Finally 7:19	functionalities	graduated	hospitals 17:4	26:4
fine 7:1 8:18	25:16	12:8,13	hour 7:22 9:13	interested
8:21 45:16	further 46:22	gravity 26:17	45:12	49:12
finish 7:9,11	49:10	27:6,18 28:7	housekeeping	interface 18:1
Finnegan 3:7	furthest 34:9	28:17	6:18	25:13 35:22
first 6:19 7:7		Great 7:3	housing 42:7	36:4
12:12 18:18	G	Group 4:5,13	42:8	internal 26:5
39:16	G 6:1	guess 12:10	Howard 1:5	interrupted
firsthand 19:3	gain 36:5	32:10 34:2	20:2 50:1	18:8 39:5
20:8,11,16	Garrett 3:7			introduce
29:6	gathered	H	I	39:10
fleet 25:18,20	22:20	H 5:7	identification	invent 43:17
FLO 29:10,10	GCX 5:16	half 9:13	12:21 33:14	invention
floor 28:19	19:18 46:2	hand 49:15	36:20 39:21	27:19
focused 12:21	46:12	hardware	46:6	involved 12:3
follows 6:6	gears 10:13	13:13,15	identify 27:18	17:16 30:5
foregoing	general 19:11	head 7:16	important	31:21 44:4
48:12	23:14 24:4	healthcare	18:13 23:15	involves 17:6
form 14:10,17	24:13 26:21	5:10,16	24:8,9 41:17	involving
30:9 32:17	27:2	12:22 13:2,9	impossible	11:18,22
32:19 33:1	generally 17:4	17:3 23:17	43:1	IPR 8:15

IPR2023-012... 5:22 15:21	18:17,19,22 19:3 20:6,22	lists 46:2	35:4,10,16	32:7 41:12
IPR2023-012... 1:14	22:9 24:14	litigation 4:12	38:19	41:14 42:6
items 6:18	24:19 26:13	11:18	M48 25:9,11	42:15 43:3
42:21	29:1,5 30:11	litigations	26:2,2,5	medical 12:12
	31:12,20	11:20	manage 11:10	13:4,6,9,11
J	32:12 33:7	LLC 1:8 4:13	25:19,20	13:17,21
J 4:12 48:4	34:22 36:13	LLP 3:8 4:5	management	14:8,15,21
Jaco 5:17	39:13 41:22	located 44:11	25:18	17:5 20:2
19:17 20:6	43:10 44:6	44:18 45:7	managing	21:11 24:6
20:13,17,21	45:20	location 28:5	11:13	28:18
29:9 46:3,12	knowledge	locking 36:3,6	manual 5:15	medication
46:15	20:8,11,16	39:8	39:18 40:5,6	24:16,16
JAMES 4:4	23:4	log 39:1	manuals 20:10	27:12,13
Jim 14:11	KWAK 4:4	logic 27:22	manufacture	32:1,5 36:2
jkwak@stan...	14:10,17	logo 46:2	13:21	38:21
4:9	30:9 32:17	long 10:22	marked 5:20	medications
job 12:12,16	33:1 47:3	look 18:21	15:17,20	13:11,12
13:18	L	23:16 28:13	33:13 36:19	24:18
JOHN 3:6	L 4:4	34:5 40:20	39:20 46:5	meet 17:1 20:3
john.mulcah...	label 13:16	looked 25:12	market 18:13	20:3 34:17
3:14	lack 38:16	looking 16:17	19:12 21:14	37:21 41:15
joined 12:18	language	19:2 42:12	21:17 22:8	meets 34:20
JORDAN 3:4	32:14	looks 40:4,12	26:7,8 27:1,8	38:1 41:16
5:4 6:8 15:19	laptop 40:15	42:4	27:16 30:14	41:17
33:16 37:1	41:1,6	lot 13:13 17:6	31:5 45:1,4	mentioned
40:1 45:11	launched	lower 26:17	marketing	10:16 16:8
45:18 46:20	30:15 34:2	27:5 28:17	21:5 37:7	21:10 24:6,9
47:6	law 4:5,13	M	marriage	25:8 26:2
K	15:1	M 3:4,6	49:12	30:21
keep 7:7	lawyers 9:6	M29 30:13,20	matter 2:6	mentioning
kind 16:13	LCD 5:17	M38 21:11,14	49:13	46:17
17:2,5 18:5	left 33:9 34:8	22:13 23:7	mean 9:2 13:7	MICHAEL 3:5
18:10 27:11	34:10 36:15	23:11 24:3	14:20 19:9	michael.you...
27:22 30:16	37:14	25:8,10 30:6	19:17 20:12	3:13
31:2,5 33:22	legs 28:5	30:11,18,20	20:14,17	MICHELE 2:8
kindly 7:10	level 30:4	31:8,12	23:1 24:14	49:4,18
kinds 24:18	line 31:10 50:6	32:15,18	25:7 29:4,19	microphone
know 6:20 7:4	50:8,10,12	33:21 34:1	32:11 42:19	18:7 39:4
7:19 12:1	50:14,16	34:21 35:2,5	44:15,16	middle 42:13
15:4,7,15	listed 35:6,11	38:11	means 7:5	mind 7:7 19:16
16:6,12,18	35:17 38:8	M38e 5:11	13:3	28:21 29:3
17:14 18:4,5	38:14	33:11 34:13	mechanism	mobile 5:12
		34:17,22	31:13,15,18	18:2 36:16
			31:22 32:2,6	model 30:12

30:20 34:9 34:10,11,13 34:17 35:1,4 35:11,17,20 36:6 37:15 37:15,17,20 38:3,7,14,22 41:1 models 35:2,5 35:11,17 38:4,8,14 39:7 46:18 modification 34:1 modules 39:8 money 21:5,14 21:17 moniker 26:5 monitor 40:14 41:6,8,11 month 12:9,19 12:20 morning 6:9 mounted 13:3 13:17 24:17 24:22 27:10 28:2,4,4 41:3 41:11,13 Moving 16:4 MULCAHY 3:6 multiple 29:4 <hr/> N <hr/> N 3:1 6:1 name 6:10 19:14 23:13 26:7 29:7 50:1 necessarily 45:1 need 7:19 24:11,22 new 31:7 36:12 39:13	42:10 nod 7:16 Notary 2:8 50:22 notch 42:6,14 noted 48:14 notice 2:7 25:12 number 8:16 8:20 46:3 numbered 36:8 Nurse 5:12 36:16 <hr/> O <hr/> O 6:1 oath 8:3 Objection 14:10,17 30:9 32:17 33:1 obtain 16:11 22:10 obtained 22:6 offer 20:21 24:19 offered 31:8 OFFICE 1:1 Ohio 4:7 okay 8:1,20 14:20 15:13 33:8 39:9,12 39:15 40:11 42:1 45:22 46:8,20 47:6 onboard 25:13 open 8:9,11 15:15,16 33:6 36:12 36:14 39:14 45:21 operating 5:14 39:18 40:5,6	opportune 17:11 option 34:10 37:15 options 34:9 41:1 order 27:12 ordinary 14:8 14:15 organization 10:19 11:14 original 30:7 30:13 34:1 outcome 49:13 Outlook 8:11 8:12 overall 17:20 31:3 34:19 owned 19:18 Owner 1:9 4:3 <hr/> P <hr/> P 3:1,1 6:1 pad 36:8 38:22 page 5:3,9 34:5 35:2 37:11 39:16 40:9,12,16 40:19,22 41:19,21 42:2,13 50:6 50:8,10,12 50:14,16 paragraph 18:21 28:13 43:10,12,14 paragraphs 26:12,16 Paralegal 4:12 part 32:6 34:19 46:3 particular 19:20 23:17	25:22 27:2 34:15 Particularly 24:7 parties 49:11 pass 41:20 patent 1:1,3,9 1:12,15 4:3 8:16,16,19 8:20 9:15,22 10:4,6,11,12 11:18,21,22 15:1,5,8 27:18,19 30:8 32:13 43:16,18,21 44:2 patented 43:15 patents 30:17 44:5,8 patient 13:10 13:12 penalty 48:11 pending 7:21 performance 11:15 performed 16:11 22:1 29:21 30:2 perjury 48:11 person 14:7 14:14 personally 30:1 perspective 26:6 petitioner 1:6 2:6 3:3 6:7 28:9 phone 9:14 picture 42:12 43:1 pieces 13:15	pin 36:3,5,5,8 38:19,21,22 placed 43:5 platform 25:11 26:1,6 30:17 31:8,11 33:22 34:1 34:19,20 37:22 44:12 44:19 45:8 please 6:10,20 7:10 16:10 16:18 18:22 26:13 29:8 33:6,20 34:6 36:12 37:5 37:12 39:13 40:10 41:22 45:20 point 20:20 23:22 25:22 31:6 portion 33:2 44:12,19 45:8 portions 9:17 9:19 position 10:15 11:7 17:11 17:12 24:11 power 18:1 PowerCart 29:11 practice 21:22 precursor 30:12 prepare 8:22 9:2,8 preparing 9:12 presence 35:9 35:15 38:12 PRESENT 4:11 President 6:12
--	--	---	--	---

10:17 previously 5:20 15:17 25:8 PRI2023-012... 1:11 primary 6:12 13:1 printers 13:16 13:16 prior 28:9 30:17 procedures 16:14 proceeding 28:10 proceedings 8:15 product 17:2,4 17:8,9 19:13 22:6,21 25:12 26:3 34:3 40:7,13 41:7,15 products 16:13 17:1 18:11 promote 20:9 prone 28:18 protrudes 42:6 protruding 27:11 provide 25:18 26:9 provided 13:14 Public 2:8 50:22 published 18:18,20 21:2 purchase 19:4 23:7,11 24:3 25:1,6	purpose 42:20 pursuant 2:7 push 38:19 pushed 28:18 put 17:8 33:5 36:12 39:10 45:19 puts 17:9 <hr/> Q question 6:21 7:10,11,21 14:13,19 35:14 42:9 42:10 questions 15:11 46:22 <hr/> R R 3:1 6:1 48:4 49:1 read 9:15,16 9:17,19,22 48:11 ready 42:10 really 12:2 15:4,7 16:22 31:4 35:19 38:17 rear 27:10 42:14 rear-mounted 31:2 reason 23:17 24:2 50:6,8 50:10,12,14 50:16 reasons 23:10 23:13 24:4,5 24:5 25:5,7 rebranded 46:12 recall 12:9,19 recess 45:17 recognize	15:21 33:17 37:2 40:2 46:9 record 6:10 7:6,8 45:13 49:8 50:3 redirect 47:4 refer 8:15,19 16:4 33:11 36:17 39:18 46:4 referenced 46:15 references 28:9 referred 5:20 15:18 referring 19:11 regardless 38:20 regular 21:21 related 8:15 12:2 13:5 17:16 21:22 49:10 relates 16:13 17:20 Remote 2:4 rep 13:20 repeat 6:20 14:12 rephrase 6:21 report 10:20 reporter 7:5 18:7 39:4 49:4,18 require 15:5,8 17:8 required 16:15 requirement 18:9,12 requirements 17:1,18 41:18,20	resonate 23:20 respect 19:4 responsibilit... 6:13 10:21 13:1 responsibility 10:17 responsible 11:13 Reston 3:10 revenue 11:15 review 9:3 28:11 47:5 reviewed 28:8 46:13 right 6:17 7:12 8:17 10:6,7 12:14,19 13:6,19 14:5 15:5,8 21:12 26:10 32:8 34:14 36:10 37:18 39:9 40:7 41:8 42:3,15,16 42:18,21 43:3,6,8,13 43:18,21 45:11,14,15 Riverside 4:6 roll 10:21 rolling 13:10 RPR 2:8 Rubbermaid 11:2,4,5,7,12 23:6 30:7 44:5,9,10 45:5 Rubbermaid's 11:17,21 43:15 44:17 RUI 18:1 35:21 36:4,7,8	38:19 Rydingsward 1:18 2:4 5:3 6:5,9,11 7:15 8:22 12:4 15:22 19:7 28:8 33:5,17 36:10 37:3 39:9 40:2 43:8 45:12 46:10 47:1,9 48:10 50:19 Rydingswar... 5:21 <hr/> S S 3:1 5:7 6:1 safe 18:4 safety 16:22 17:20 18:12 24:7 sales 6:13 10:18,19 11:8,12,13 13:18,20 26:10 sales-related 10:21 saying 18:9 22:2 27:5,7 39:6 says 19:3 33:10 36:16 39:17 scan 31:9 scanner 31:9 scanning 13:11 scenarios 21:21,22 scenes 25:17 Scratch 42:8 screen 18:2 25:13,15,17
---	--	---	--	---

38:18,19 seated 24:11 section 9:21 10:5,11 see 15:20 19:7 33:9 34:11 36:15 37:14 37:16 39:16 40:12,16 46:1 segments 10:20 sell 34:3 selling 13:1 send 22:1 Senior 6:12 10:17 sent 15:14 sentence 19:2 19:7 series 29:14 29:16 34:8 service 22:1,1 22:2,3 set 49:6,14 setting 13:9 23:17 settings 17:3 shake 7:16 shape 42:14 sheet 5:11,13 5:18 35:6,12 35:18 38:4,9 38:15 42:8 sheets 20:10 shift 10:13 shorthand 49:4,18 show 28:6 showing 41:1 41:4 shown 35:2 40:19 shows 42:2	43:1 shut 8:10 side 13:13 24:21 42:14 43:2 sign 47:5 Signature 47:8 48:19 significant 35:19 similar 31:1 46:13 Simplifi 20:1 20:22 sitting 24:13 size 36:7 skepticism 45:6 skill 14:8,15 slide 32:10 slides 31:13 31:14,18,20 31:22 32:4 32:12,13 sliding 32:6 SlimCart 5:14 39:17 40:7 40:19 41:10 41:15 42:3 42:17 43:6 smart 25:11 software 13:13 25:18 sold 21:12 solutions 1:8 5:16 12:21 13:2,3,5,8,14 46:2 sorry 11:2 14:11 20:14 21:8 26:4 sort 27:12 Sounds 8:2 space 12:22	speak 17:15 18:4 spec 20:10 specific 11:19 19:14 27:1 28:21 29:2 46:11 specifically 45:2 specifications 21:3 specificity 10:12 specifics 12:2 specify 27:20 spend 21:5,14 21:17 spent 9:12 spoken 7:15 SR 3:5 stability 17:16 24:8 29:18 29:22 41:20 46:15 stable 27:3,15 29:5,10,11 29:12,13,16 standard 16:21 17:3 18:6,10,14 34:18 35:7 standards 17:7 18:5,12 34:20 38:1 41:17 standing 24:11,12 Standley 4:5 4:13 stands 33:22 state 6:10 43:15 statement 19:22 26:21	27:2 28:22 31:16 statements 26:20 STATES 1:1 Station 5:12 36:16 storage 41:2 Street 3:9 subscribe 18:11 SUBSCRIBED 50:20 sued 43:20 44:6 Suite 3:9 suits 11:22 12:1 supported 28:3 sure 6:11 7:8 10:16 16:3 16:20 19:17 22:5,21 23:14 25:7 27:20 29:9 30:5 33:21 35:13 37:6 45:16 surface 32:16 32:18,19,22 33:2,4 35:22 36:4 survey 22:2 23:2 surveys 21:20 22:4,10,11 22:15,16,22 23:5 sworn 2:7 6:6 49:7 50:20 system 17:21 18:1 Systems 12:18	13:15,18,20 <hr/> T T 5:7 48:4 49:1 49:1 tablet 40:14 41:6 take 7:20,22 17:14 18:21 28:13 36:11 43:8 45:13 46:20 taken 45:17 48:12 talk 7:8 talking 16:6 40:16 team 44:22 technology 12:22 41:5 tell 14:1 16:2 16:12,14,18 20:12,17 30:6,10,11 33:20 37:5 40:18 41:10 ten-minute 45:13 term 19:10 tested 29:17 29:19,20 30:4 testified 6:6 46:17 testimony 8:14 48:15 49:8 testing 16:10 16:16 17:7,7 17:9 30:4 tests 17:15 29:22 things 7:7 13:14 43:5 45:1 47:2
--	--	--	--	---

think 13:8 26:22 32:9,9	transcription 50:5	31:17 41:4	wheels 17:12	1
thinking 19:21	TRIAL 1:3	user 35:21	27:11	1 1:19 6:2
29:3	true 48:15 49:7	43:5	WHEREOF	48:13 50:2,3
third 19:2	try 7:22	users 23:20	49:14	10:17 45:14
thought 14:11	trying 40:21	24:10	windows 8:8	10:21 47:10
31:5	turn 26:12	uses 31:12	witness 2:5,7	1041 5:10
three 40:13	40:9 41:21	35:7 38:17	5:3 45:16	33:12,13
threshold	47:1	V	47:4 49:5,14	1042 5:12
28:19	turning 17:12	v 1:7 3:5 50:1	Witness' 18:7	36:18,19
Thursday 1:19	two 8:15 12:20	value 23:22	39:4	1043 5:14
tilt 17:10,13	40:22,22	25:22	word 31:20	39:19,20
tilt-tip 17:7	41:3,7	variety 13:7	work 32:15,18	1044 5:16 46:4
time 1:20 7:8	typically 24:17	41:4,5	32:19,21	46:5
9:11 11:4	U	verbal 7:15	33:2,3 35:22	11 18:21
30:14 31:6	U 48:4	Vice 6:12	36:4 44:12	13 26:12
35:14 44:4,6	U.S 8:16,19	10:17	44:19 45:8	14 26:12
44:9 47:1	UL601 18:5	Virginia 2:9	worked 12:17	15 5:21
tip 17:14 28:18	UL60601 16:8	3:10 49:3	31:8,10	16 28:13 42:8
title 6:10 33:10	16:11,19	visually 23:15	works 42:20	17 41:21 42:2
36:16 39:16	18:9,17 19:5	25:10	wouldn't 14:20	18 43:10,12,14
today 7:6,14	19:12,15,19	visuals 28:12	wristband	1875 3:9
8:4,14 9:1,4	20:18 21:1	W	13:16	2
9:9 34:3	34:17,20	waived 47:8	write 28:16	2 34:5 35:2
46:14,17	37:21 38:1	want 10:13	written 7:6	37:11 50:4
47:1	41:15	15:11 17:4	wrong 17:13	2003 12:8
today's 9:12	ultimately	24:16 43:9	X	30:14 34:2
tool 25:18	11:14	wanted 31:5	X 5:7	2015 11:2,3
top 22:7 33:9	understand	wants 22:8	Y	2018 5:21
36:15 41:11	6:19 8:3	wasn't 12:2	yeah 14:6	15:17,21
41:13 46:1	14:18 22:7	way 27:4,8,14	19:17 22:5	20190 3:10
touch 18:2	32:11 44:1	49:12	22:10 23:3,3	2024 1:19 6:2
25:13,15,16	understandi...	we'll 22:1	28:11 29:4	48:13 49:15
38:18,19	20:3 30:3	45:14	30:10 35:13	50:2,20
TouchPoint	31:16 43:22	we're 7:4 8:14	35:19 42:4	2029 49:19
29:11	44:3,4	32:12 40:21	43:19	203-2471 3:11
TRADEMARK	understood	41:3	year 18:17,20	3
1:1	6:22 7:17,18	we've 22:14	21:6	3 50:5
transcribed	UNITED 1:1	45:12	YOUNG 3:5	31 49:19
7:5	unsuccessful	weight 17:10	Z	33 5:10
transcript 5:8	44:20	26:18 28:1	Zoom 8:9	36 5:12
33:15 36:21	upload 15:10	28:16 41:18	0	39 5:14 30:13
39:22 46:7	use 24:12 26:7	41:19		30:20
48:12		west 11:10		

4 43017 4:7 46 5:16 4th 49:15				
5 5 40:9,12,19 40:20,22 517 3:11				
6 6 5:4 40:22 41:19 60601 16:15 16:21 17:16 20:4 21:4 41:20 614 4:8 6300 4:6 650 8:20 9:22 11:18 15:8 43:16,18,21 44:2 668 8:16 9:15 9:21 10:4 11:22 15:5 27:17,19 30:7 43:16 43:18				
7 7,594,668 1:12 8:16 792-5555 4:8				
8 8,215,650 1:15 8:20 800 3:9				
9 9:01 1:20 6:3				