IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
EASTERN DIVISION

NUHN INDUSTRIES, LTD.,

Plaintiff,

-vs- Case No. 3:22-CV-00015-SMR-HCA

BAZOOKA FARMSTAR, LLC,

Defendant.

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VIDEO DEPOSITION OF REIDAR OLOFSSON

TAKEN ON THE 5TH DAY OF SEPTEMBER, 2024

AT MERCHANT & GOULD, P.C.

MINNEAPOLIS, MINNESOTA

9:04 A.M.

* * * * * *

Taken before Shannon Caflisch, RPR

APPEARANCES:

SCOTT YACKEY, of the firm of HARNESS IP, 2801 Network Boulevard, Suite 600, Frisco, Texas 75034, appeared remotely via Zoom representing the Plaintiff.

MICHAEL KELLA, of the firm of HARNESS IP, 7700 Bonhomme Street, Suite 400, Clayton, Missouri 63105, appeared remotely via Zoom representing the Plaintiff.

THOMAS LEACH, of the firm of MERCHANT & GOULD, P.C., 150 South Fifth Street, Suite 2200, Minneapolis, Minnesota 55402, appeared representing the Defendant.

ALSO PRESENT: Max Orenstein - videographer

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* NOTE *

(Original exhibits were attached to original transcript; copies to transcript copies.)

VIDEOGRAPHER: Good morning. We are now on the record. This is Media Unit 1 of the video recorded deposition of Reidar Olofsson taken by counsel for the plaintiff (sic) in the matter of Nuhn Industries, Ltd. versus Bazooka Farmstar, LLC filed in the United States District Court, Southern District of Iowa, Eastern Division, Case No. 3:22-CV-00015-SMR-HCA. The location of the deposition is Merchant & Gould.

My name is Max Orenstein. I'm representing Veritext. I'm the videographer. Our court reporter is Shannon Caflisch from the firm Veritext. She is the --

Will court reporter please swear in the witness? And then the counsel may proceed.

MR. LEACH: One -- one quick clarification. This is the deposition by the Defendant Bazooka Farmstar, LLC of the witness.

REIDAR OLOFSSON,

after having been first duly sworn on oath by Shannon Caflisch, deposes and testifies as follows:

EXAMINATION

BY MR. LEACH:

Q Good morning, Mr. Olofsson.

A Morning, morning.

Q Can you please state your full name -- full legal name for the record?
A Yeah. My name full is Sven Erik Reidar Olofsson.
Q And do you go by Reidar?
A Reidar is my name, yes.
Q And how old are you, sir?
A I'm born '58, so I'm 65 now.
Q And where do you currently live?
A I live up north in Sweden, 600 kilometers north Stockholm, a place called Dorotea, a small place.
THE COURT REPORTER: Could you please that?
THE WITNESS: Dorotea, D-o-r-e-a-t-a (sic).
Q (By Mr. Leach, continuing) And are you here today to voluntarily provide facts about the Truxor amphibious multi-tool vehicle, and specifically the Truxor DM 5000?
A Yes.
Q And you understand you were just sworn in, that your testimony here is the same as if it was in a courtroom in front of a judge or jury?
A Okay. Yes.
Q And given that your English is very good, are you comfortable proceeding in English today?
A Yeah, I think so.
Q Just to go over a few kind of formalities, if my questions aren't clear at any time, please ask for me to

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re -- rephrase them or maybe clarify. But if you answer, I'll assume you understood the question; is that fair?

A Okay.

Q And you understand that your testimony will be recorded today by a court reporter?

A Yeah.

Q And also the deposition will be videotaped by a videographer, correct?

A Yes.

Q And so given that the court reporter is going to take everything that's said on the record today down, we need you to provide verbal answers so she can hear -- hear the answer. And, also, I'll ask -- I won't speak over you, I'll try to go slow; and I ask that you don't speak over me, so the court reporter can get everything that's said.

A Okay.

Q Is there any reason, such as any medication that you're on, that you couldn't understand my questions and provide truthful responses?

A No.

Q Can you briefly provide me with your education?

A Yeah. Usually school in Swedish -- or Sweden are 1st grade to 9th. And after that, you go to gymnasium, and

then I go two years in gymnasium.
Q And what did you study in gymnasium?
A It was mechanical maintenance of cars you say.
Q Okay. And are you currently employed?
A No. I am retired.
Q And when did you retire?
A For last year in July.
Q So would that be July 2023?
A Yes.
Q And where did you work before you retired?
A Yeah. I work at what they -- now they call Truxor Environment.
Q Is it Truxor Wetland --
A Truxor Wetland Environment, yeah. And before that, I was -- it was Dorotea Mekaniska AB.
Q Okay. And we can spell that.
A It's D-o-r-o-t-e-a M-e-k-a-n-i-s-k-a A-B.
Q And -- and the -- the current company, I think you said it was Truxor Wetland --
A Equipment.
Q -- Equipment --
A Yeah.
Q -- AB. Okay.
A Yes.
Q Okay. So that's -- that's the company, Truxor Wetland

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Equipment, that purchased Dorotea Mekaniska?
A Yes.
Q Okay. And do you know when that purchase took place --
A I think --
Q -- about?
A -- about six years ago.
Q Okay. And so for the last about 30 years, have you worked at Dorotea Mekaniska and then Truxor Wetland Equipment?
A Yes.
Q Okay. And they're basically the same company --
A Yeah.
Q -- correct?
A Yes.
Q And so is it okay if I just call the company going forward in the depo Truxor?
A Yeah, that's okay.
Q And that's spelled T-r-u-x-o-r?
A Yes.
Q And so you worked at -- at these two companies continuously since about 1994?
A Yeah, that's correct.
Q And then after that, you retired about -- in July of 2023?
A Yes.

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Q Okay. Can you explain -- or can you tell me what your responsibilities were at Truxor when you started?
A Yeah. I started, some would say, in '94 and I helped the -- the owner then that's called Torbjorn Hallin who runs the Dorotea Mekaniska.
Q And can you spell his name, please?
A T-o-r-b-j -- you don't have -- O dot dot, and, r-n. After name, H-a-l-l-a-n -- i-n.

Yeah, I help Torbj rn with -- he was -- have many ideas about what we could do for making -- cutting the -- the weeds in the -- and helping clean -- get clean water from the lakes.

And so I help him with the -- develop -- develop these ideas he had, and I make the drawings. And -- and from the beginning, I also make the -- the prototypes and all the way to -- to a product that we can --

Q Okay. So --
A -- produce and sell.
Q -- would it be fair to say that your responsibilities at Truxor were for design, development, and testing of Truxor's products?
A Yes.
Q And did that include the Truxor 4700 and the Truxor DM 5000?
A Yes.

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Q And so can you briefly explain what your responsibilities were for the Truxor DM 5000 product?
A Yeah. So all the same from the ideas from Mr. Torbj, rn how he wants to -- to make -- make the product better. And we -- for that example, we changed the hydraulic system to make it -- make more hydraulic power to -- can put on different tools. And I have also contact with suppliers for -- to get him there.
Q So when you say contact suppliers, do you mean purchasing, like, the engines, the -- the parts for the -- to build it?
A Yeah, the parts hydraulics and --
Q Okay.
A -- systems.
Q And so is it fair to say that you were intimately involved in the design, development, and production of the Truxor DM 5000?
A Yes, I was.
Q And did you also support that product in its life cycle when it was sold?
A Yes. It goes on, yes.
Q And so would it be fair to say that through your personal experience designing, developing, and testing and supporting the Truxor DM 5000 amphibious vehicle, did you become personally familiar with the vehicle and

its functions?
A Yes.
Q Are you also personally familiar with the design, functionality, parts, and tools that are used on the Truxor DM 5000?
A Yes, I am.
Q And can you -- can you just briefly explain how you're familiar with how the product functions, its design, maintenance, parts, tools generally?
A Yeah. I -- because I was from -- from the beginning, from the idea, I take it further. So I make the drawings, and also sometimes I even make all the prototypes and then testing. So I been with this product all the chain.
Q Okay. And when you say with this product the whole chain, do you mean from inception to --
A For production.
Q -- through production.
A Yes.
Q Okay. And when you say "this product", we're talking about the Truxor DM 5000, correct?
A Yes.
Q Okay. And with respect to -- well, let's step back.
The -- the Truxor DM 5000, can you briefly explain what that vehicle is?

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A Well, it's a -- it's an amphibian machine that you can drive on the hard surface and the wetlands and down -- and even to waters.
Q Okay. So it's an amphibious vehicle.
Does it carry any tools to -- to do work?
A No. You -- you don't have -- if you have tools to do some work, you can -- must put on some tools. Because the -- only the Truxor 5000 don't -- you don't -- can't do any work without any tools.
Q Okay. Let me see if I -- I may have --
A They call it a tool carrier.
Q Okay. So -- so the Truxor 5000 -- the -- the Truxor DM 5000 amphibious vehicle has a number of different tools that can be attached to it to, say, cut weeds, to dredge ponds or lakes and ditches --
A Yes.
Q -- and a number of other things, correct?
A Yeah -- yes.
Q And so again just briefly, the Truxor DM 5000 product, it was an amphibious vehicle, correct?
A Yes.
Q And can you just briefly describe, you know, did it have an engine? Did it have tracks or wheels? How did it float? Can you provide --
A Yeah. It's -- it was, what you say, a type of

catamaran. You have two pontoons that floats -- it floats on. And around these pontoons, it was drive belts with what we call drive plates. And with these plates, it goes on hard surface and in water it pedals it forwards and backwards.

And it's the frames that connect these pontoons so it make a whole machine. And then it -- in the top, we have what we call the sledge where the driver's seat and the engine compartment and the hydraulic pumps, and then the hoses goes from this sledge to the hydraulic motors that works in the back of the -- each pontoon to drive this belt.

Q Okay. And when you said the -- the -- there's a sledge that the operator and the engine are on, does that sledge move backwards and forwards?

A Yes. You can -- you can do it -- and you make it go forward and backward by -- by hydraulic.

Q And what is the reason to have the operator seat and the engine move forward and backwards on the --

A It's --

Q -- on the amphibious boat?

A It's a kind of weight distribution. Because you have -- in the front, you have the lift on where you put every tools. And when -- especially when you -- so you put on the rake to collect the things you have cut on the

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surface, then you collect more and more and then it becomes very heavy. And if you can't put the weight less backwards, then it will tilt and tip and goes on its the nose, you say.

Q Okay.

A So you drive the whole sledge backwards to get it going even in the water.

Q And so would you say it was designed to keep the center of gravity in the center of the machine?

A Yeah, depending on how much -- how heavy you have in the lift arms, yes.

Q And so if you put a heavier tool on the front of the machine, you could move the seat and engine back a little bit to -- to make the center of gravity in the center of the vehicle?

A Yes. Yes.

Q I think earlier you mentioned that the Truxor DM 5000 was an improvement from the Truxor 4700.

Can -- can you explain a little bit about what the improvements were from the Truxor 4700 to the Truxor DM 5000?

A Yeah. The Truxor 4700 have separate hydraulic pumps, one for each belt -- drive belt. And in the area, there was a smaller hydraulic pump for -- for the lift arm. And the -- in that -- in that case we only have a cutter

-- cutter -- hydraulic cutter in the lift arm so you need so -- so much hydraulic flow.

Q And is that in the 4700?

A Yes, the 4700.

Q Okay.

A And the engine was a little bit smaller. So you can use different tools than -- that needs more hydraulic flow, then we came up with this Truxor 5000 that have a bigger engine and only one hydraulic pump for make supply to every outlets -- hydraulic outlets with oil and even the -- the drive bands, also.

Q And so in the Truxor DM 5000, the engine drove a hydraulic pump and that hydraulic pump drove the wheels and the -- the tool --

A Yes.

Q -- tools?

A Yes.

(Deposition Exhibit 15 was marked for identification.)

Q (By Mr. Leach, continuing) I'm handing you what's been marked as Defendant's Exhibit 15, and it bears the Bates No. TRUX0000245.

Can you please take a look at this document, sir?

A Yes.

Q Scott, are you able to pull that up?

MR. YACKEY: Yes. You said 245?

MR. LEACH: Yes.

MR. YACKEY: Yep.

Q (By Mr. Leach, continuing) Mr. Olofsson, are you familiar with Truxor's recordkeeping? Like how it keeps documents that it uses in its business or it generates in its business?

A Yes, I am.

Q Can you tell me what Defendant's Exhibit 15 is?

A Yeah. It's -- it's a document that say from what type of -- say what name of the Truxors and where they start to sell and how long it -- you can -- it was on the market.

Q And how are you familiar with this document?

A Yeah, I made this document.

Q And so this document shows when the various Truxor products were -- started being sold and stopped being sold --

A Yes.

Q -- is that correct?

A Yes.

Q And so if we look at the Truxor 5000 in the Column f.o.m, what date did that -- did the Truxor 5000 start being sold by Truxor?

A As it says, 2009 in March, I see.

Q Okay. And so the Truxor 5000 was on sale as of March 2009?
A Yes.
(Attorney Michael Kella joined the Zoom link).
Q (By Mr. Leach, continuing) What does -- in the top of that column, what does f.o.m stand for?
A This from and to.
Q Okay. And so when -- when was the Truxor 5000 discontinued or sold?
A It's 2018 --
Q Okay.
A -- in July.
Q And so in the column To, it says, for the Truxor 5000, 201807. Is that July 2018?
A Yes.
Q Mr. Olofsson, is this document a document -- and when I say "this document", is -- is Defendant's Exhibit 15 a document prepared and kept in the ordinary course of Truxor's business?
A Yes.
Q Is this a record that is made or updated to track when certain products are introduced or discontinued?
A Yes.
Q Is this document, DX 15, made or updated at the time these products were offered or discontinued?

A Yes. Yes, it was.
Q And I think so you mentioned this, but you created this document?
A Yes.
Q And did you obtain this document from Truxor's business records?
A Yes.
Q And from the location where you kept it in the ordinary course of Truxor's business?
A Yes.

(Deposition Exhibit 16 was marked for identification.)

Q (By Mr. Leach, continuing) Mr. Olofsson, I'm handing you what's been marked Defendant's Exhibit 16 and it bears the Bates No. TRUX0000246 and 247.

Can you please take a look at this document, sir?

MR. LEACH: Scott, do you have that document up?

MR. YACKEY: Yes.

Q (By Mr. Leach, continuing) Okay. Can you tell me what Defendant's Exhibit 16 is?
A Yeah. This is -- what's it say -- price list from 2009 retailer price list from 2009. And then in the top there, we see the item numbers and description. And at that time, we sell the 4700 and the 5000 Truxor.

Q Okay. And so this is a document showing the price list for the Truxor DM 5000?
A Yes. And it's tools also.
Q And the tools that were sold along with it?
A Yeah.
Q If -- if you go down to accessories for tool carrier Truxor DM 5000, what is the first product listed there?
A Yeah, that's the Doro pump -- the hydraulic Doro pump that can be used for Truxor 5000.
Q Okay. And what type of pump is that?
A It's a centrifugal water pump, a dredge pump.
Q Okay. And how do you recognize what this document is? How do you recognize this document as Truxor's 2009 retailer price list?
A I'm not sure what you really -- what you really ask for.
Q Sure. I'm asking is this a document that was kept in the ordinary course of Truxor's business?
A Yes, sir.
Q And is this a document you recognize through your work at Truxor?
A Yes. I have seen them before --
Q Okay.
A -- yes.
Q Okay. And -- and you understand the information in the document?

A Yeah. I know it usually updates every -- every year, yes.
Q Okay. And was this document obtained from where it normally is kept at Truxor?
A Yeah.
Q And -- and who normally keeps the price list document?
A It was the -- the salesman.
Q And -- and, again, is Exhibit DX 16 kept in the ordinary course of Truxor's business?
A Yes.
Q And is this a record that is routinely made or updated to provide product pricing for each year?
A Yes.
Q And is it typically made or updated around 2009 or maybe just before?
A Yes.
Q Do you know who created this document?
A I don't have the name on.
Q Okay. But someone in sales likely?
A Yeah, probably maybe it would have been Torbj rn, the former -- former owner.
Q Okay. And is the person who made and maintained this record a person who had knowledge about the information contained in the document?
A Yeah, yeah.

Q And so as of 2009, how much was the Truxor DM 5000 being sold for in euros?
A In euros, it say 65,802 euros.
Q And in 2009, how much was the Doro pump hydraulic dredge pump being sold for?
A It was sold for 6,018 euros.
Q And the Doro pump was one of the tools made to be used on the Truxor DM 5000?
A Yes. It was developed at the same time Truxor DM 5000 and this Doro pump hydraulic version.
Q If you go down a ways under the heading where it says Accessories for tool carrier Truxor DM 5000 and Truxor DM 4700 B --
A Yeah.
Q -- if you go down towards the bottom, maybe the sixth item up it says telescopic arm.

Can you describe what that was?

A Yes. Telescopic arm was made for lowering and -- and highs the -- the dredge pump up from -- from the wat -- down in the water and up from the water to reach long -- deeper.
Q And was that operated hydraulically?
A Yes.
Q Going up from there, there's an item listed as the Doro cutter Mod 3090.

Can you tell me generally what that was?

A The Doro cutter Model 3090. Was that you say?

Q Yes.

A Okay. That was the -- the ordinary cutter. It looks like a T -- up and down T. You have cutter knives on both sides and also a vertical cutter. So that was the -- the first tool for cutting weeds in the -- in the ponds.

Q Okay. And going up from there, it says a dredge pump Model 2500. Can you describe what that was?

A Yeah. That was the first type of dredge pump that we used.

Q And was that mainly for the --

A 4700, yes.

Q Okay.

A But it could also be used at the 5000 model.

Q Okay. And the dredge pump Mod 2500, did that have a separate engine?

A Yeah, this is a Briggs & Stratton separate engine.

Q To -- to drive the pump?

A To drive the pump, yes.

Q Okay. But the Doro pump, which is listed under Accessories for tool carrier Truxor DM 5000 and -- and not the 4700, the Doro pump hydraulic dredge pump, that was a -- a different pump, right?

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A Yeah, that's -- because the 4700 don't have this hydraulic power to -- to -- so can't move -- can't use this hydraulic dredge pump.

Q Okay. And so the Doro pump hydraulic dredge pump for the Truxor DM 5000, that didn't have a separate engine. It used the engine from the Truxor DM 5000 --

A Yeah.

Q -- to power it?

A Hydraulic power, yes.

Q Yes. Okay.

(Deposition Exhibits 17 and 18 were marked for identification.)

Q (By Mr. Leach, continuing) Mr. Olofsson, I'm going to hand you Defendant's Exhibits 17 and 18. It's DX 17, which is BAZ15_0026657 through 26665; and Defendant's Exhibit 18, which is Bates numbered BAZ15_0026649 through 26656.

Can you please take a look at these documents for me, sir?

A Yep. Yeah. This is the documents of -- when -- when they start mount the Truxor together from -- from different pre-made constructions. And this is -- in, you see, No. 18 in the top it says Model Truxor 5000 and then you have the number -- the chass -- what do you call it, chassis number 945031.

Q Okay. Let's start with DX 17.
A 17, okay.
Q Okay. And let's just go through that document.
On DX 17, the first page, BAZ15_0026657, what was the model -- first off, what is the top BAT specification? Is that -- what does that mean?
A Yeah, yeah, it's a specification how the -- the Truxor model -- how it -- how it looks. And the specification lower down, you see the hydraulic motors and -- and the valves and how the specification of the -- of the Truxor is.
Q Okay. Kind of the specific design of it or the -- the specific features it had?
A Yeah. And they take, what you say, serial number of the -- the engine or the hydraulic pumps and -- and write -- write in so you can -- afterwards maybe have a problem, okay, we know the serial number of the hydraulic pump, so we can reclaim maybe to the reseller -- reseller.
Q Okay. And so if you turn to the next page, what -- what is the next page showing?
A It's -- it's what -- what kind of tools that this customer wants together with the Truxor.
Q And -- and what tools were on this -- well, strike this.
Is this -- is this group of documents, DX 17, is

this kind of a -- showing this -- like the -- the packing list or sale of -- of the document?

A Yeah. That -- this document go out -- go out to the people who -- who put Truxor together. So they know how -- what we use and how will it be we specified in the end.

Q Okay. So what tools it would have and -- and then they track kind of what hydraulic motor was put on --

A Yes.

Q -- in terms of the serial number and that kind of thing?

A Yes.

Q Okay. And -- and then does this ultimately -- did this group of documents go to the customer, or does this -- is this a document that's just kept at Truxor's --

A I think --

Q -- facility?

A -- this also goes to the customer.

Q Okay. So if we turn to the page of Defendant's Exhibit 17, looking at BAZ15_26658, what is that --

A Yeah, the first --

Q -- page showing?

A -- the first that this marked is the -- is the -- what is it? A rake, it's a RAFSA three-and-a-half meter wide.

Q Okay. Did -- does this show that the -- this -- this

build of the Truxor included a tool dredge pump on it?
A No, not this one. Not this.
Q Okay. What is the mudder pump?
A You see mudder -- yes, this -- this is -- in the middle, you see it's marked mudder pump, yes. This is the dredge pump.
Q Okay. And then if you go down a little bit where it's checked telescopic arm --
A Yeah.
Q -- did this -- what is that -- what does that tell you about this build of the Truxor DM 5000?
A Yeah. They -- when they drive the -- use the dredge pump, they -- with this telescopic arm, they can go down deeper to make the dredging.
Q Okay. And then if we turn to the next page of DX 17, what is this page -- what does this document or this page show?
A Yeah, this is a page when special things that they will -- when they pack and will deliver the Truxor, this will also go with the shipment.
Q Okay. Is it kind of like a packing list or shipping list?
A Yes, yes.
Q If you turn to the next page, BAZ15_26660, what is that page showing?

A Yeah, this is the paper that the -- the guy who put this Truxor together, it's a test -- as it says, test certificate that they check everything. They -- they -- they will check that it functions.
Q Okay. So this is a document that is kind of a checklist to make sure that before it goes out the door to the customer, everything is working on it?
A Yes, yes.
Q And if we turn to the next page, BAZ15_0026661, what is this doc -- th is page showing?
A Yeah, this is some programming for the unit to -- you have joysticks to drive and operate the machine. And from the joysticks, it goes to this electronic unit. And this -- that you can adjust different things, how it will react from the -- from the joysticks.
Q And so the Truxor DM 5000 uses joysticks that are connected to an electric unit --
A Yes.
Q -- that -- that provides the output to the --
A Valves.
Q -- the valves of the hydraulic pump and the motor and that kind of thing?
A Yes.
Q Let's go to the next page of DX 17, and that BAZ15_26662. Can you tell me what this document is --

A Yeah, this is --
Q -- or this page?
A -- is a packing list, what you say, to one special type of cutting ESM-Klipp Model 2100.
Q Okay.
A It is some spare parts that goes with -- for that special -- that cutting model.
Q Okay. And if you turn to the next page of DX 17, and that's BAZ15_0026663, what is this page --
A Yeah --
Q -- telling you?
A -- this is the packing list for the hydraulic dredge pump.
Q Okay. And then if you turn to the next page of Defendant's Exhibit 17, which is BAZ15_0026664, what is this document?
A Yeah, this is a packing list. And that say where from, who -- who is the -- the buyer of this machine. And this was sent to Hockney Underwater Weed Cutters in Wisconsin, I think. And it say how -- every part that would be in this.
Q Okay. And so if we go down -- well, let's -- let's start with the date. What was the order date of this Truxor 5000?
A Yeah, the order date will be 2010, 11th of May.

Q Okay. And you see that under the packing list order number, and then it says order date is May 11th, 2010; is that correct?
A Yes.
Q And if you go down a little further, it says delivery address. Where was this Truxor DM 5000 delivered to?
A I don't know, but I -- here it goes directly to the customer. I don't know if it's Illinois or -- and -- but the retailer is Hockney in Wisconsin.
Q Okay. And was Hockney in Wisconsin -- Hockney Underwater Weed Cutters -- was that a dealer or distributor of Truxor at the time?
A Yes.
Q And so their customer was Integrated Lakes Management, Inc., correct?
A Yep.
MR. YACKEY: Objection, foundation.
Q (By Mr. Leach, continuing) And if you go down to kind of the center of the page, can you -- can you tell me what that information is telling you?
A Yeah. As you see, it was Description 1, there is a Truxor DM 5000. And then Description 3 is they have changed the -- the oil to the environmental oil. And Description position 4 is type of Doro cutter, the 2100. And Description 5, the rake complete.

Q And so is this basically just listing it's a packing list? This is --
A Yes.
Q -- this is everything that's being shipped to the customer?
A Yes.
Q And as one of the items that's being shipped along with the Truxor DM 5000 is the telescopic arm --
A Yes.
Q -- Item No. 7?
A Yep.
Q And Item No. 8, the Doro pump with feeding screw?
A Yes.
Q And then also the feeding wheel complete?
A Yep.
Q Okay. And can you briefly describe what the -- the Doro pump with feeder screw is?
A Yeah, it's a -- a pump and you pump up sediments from ponds or lakes or channels.
Q And so it's a -- is it a dredge pump?
A Yes.
Q And is it made for pumping sediment or -- or slurries --
A Yes.
Q -- or liquids with suspended solids?
A Yeah.

Q And what is the feeding wheel item that was -- was also sold? What is -- what is that? How does that work with the Truxor DM 5000?
A It's a tool, the Doro pump.
Q Oh, that goes on the Doro pump?
A Yes.
Q And -- and what does the feeding wheel help or what does it do with the Doro pump?
A It just rotates and, what you say, make it -- if it very compact, the sediment, you have to maybe just turn it around so the pump can suck it in.
Q So does it cut it up or chew it up to --
A Yes.
Q -- to bring the sediment in --
A Yeah.
Q -- into the pump?
A Yes.
Q Okay. And you turn to the next -- well, let me -- let me go back. Under the Del date, what does that stand for?
A A delivery date, I think.
Q And -- and so when was all of this delivered to the -- delivered?
A Yeah, 25 in May 2010.
Q Okay. For -- for the Truxor documents, is the format of

the date year, month, day?
A Yes, yes.
Q Okay. And is that generally consistent?
A Yeah, generally, yes, yes.
Q Okay. And if you turn to the next page of Defendant's Exhibit 17, BAZ15_0026665, can you tell me what this page is?
A Yeah, that's the order confirmation to the customer that says that this will come -- you have ordered this and we confirm that you -- you get this.
Q Okay. And so, again, this is showing what -- what the customer ordered or a confirmation as to what the customer ordered; is that correct?
A Yes.
Q And so can you just tell me generally what the customer -- what you're confirming the customer ordered?
A Yeah, it one Truxor DM 5000, and then you take the Doro cutter 2100 and the rake complete and some strain plates complete, and a telescopic arm for -- the following number is the Doro pump with feeding screw and also this feeding wheel complete.
Q And -- and do you know what the -- the total cost of that was?
A Yeah.
Q What does the customer pay?

A Yeah. The amount here is 58,589.80 euros.
Q Okay. All right. Let's turn to Defendant's Exhibit 18, and let's go through this document, if you would, please.
A Yeah.
Q Can you tell me --
A This --
Q -- generally what Defendant's Exhibit 18 is?
A Yeah, this is the -- just the same document that's before. But if you can see in the middle, it say TILLV.NR number, produce -- it just say a chassis number. So this tells me that on the -- on the first document, it ends with 40; and in this document, it ends with 31.
Q And so when you say the first document, you're talking about DX 17, correct?
A Yes.
Q And on this one, DX 18, the TILLV.NR number --
A The chassis ends with 31. So this is produced before the one in the DX 17.
Q Ah. The -- what we're talking about, the number in the top row, is the chassis number?
A Yeah.
Q And those numbers count up as --
A Yes.

Q -- Truxors are produced?
A Yes.
Q So as of -- would it be -- what's -- let's see, what's the date of this document? Or I guess there's probably a few dates. But as of 2010, on -- on this document, how many Truxor DM 5000s were sold?
A I think per year about 80 units.
Q Okay. And do you know, of those 80 units, how many about were sold with the Doro pump?
A It's hard to say, but I think we have some -- some lists. But maybe one -- one or two or one or three have the -- of the Truxor delivered have also the dredge pump.
Q The dredge pump?
A Yeah.
Q Okay. And that's per year?
A Yeah.
Q Okay. And so if we turn to the next page of Defendant's Exhibit 18, which is BAZ_26650, is this -- what is this showing?
A Yeah, this showing that they don't have so many tools with it. They only bought the cutter ESM 2100 and the high tipping rake.
Q Okay. And if you turn to the next page -- or the next few pages are -- can you just confirm that those are

similar to the --

A DX 17.

Q -- to the DX 17 as to what -- what they show?

A Yes.

Q Okay. Could -- could someone that purchases the Truxor 5000, was it -- strike that.

For someone purchasing the Truxor 5000, maybe they purchased the weed cutter, could they later -- or did you find that later they would call back and order additional tools for it?

A Yes, yes, they do.

Q Okay. And so -- and one of those tools would be the Doro --

A Yes, it could, yes.

Q -- dredge pump?

A Yes.

Q Okay.

MR. YACKEY: Objection, speculation.

Q (By Mr. Leach, continuing) If you turn to BAZ_0026655 of Defendant's Exhibit 18, can you just tell me what day was this Truxor 5000 ordered?

A It was ordered 27 January 2010.

Q Okay. And so that would be January 27th, 2010?

A Yes.

Q Okay. And if you go down to delivery date, was that

delivered?
A Yes, the 5th --
Q When?
A -- of the March 2010.
Q Okay. And -- and what was the price of this Truxor DM 5000?
A This order total price is 52,998.98 euros.
Q Okay. And then if you turn to the next page, the last page of Defendant's Exhibit 18, what is this showing? Is this --
A That is the packing list but -- so they know what the shipment will be.
Q Okay. And so for Defendant's Exhibit 17 and 18, are these documents that are kept in the ordinary course of Truxor's business?
A Yes.
Q And are you familiar with these documents?
A Yes.
Q And as we went through, you understand the information that's shown in them and the purpose of the documents?
A Yeah, yeah.
Q Do you know who was responsible for maintaining or creating these documents?
A Yeah, it's -- it was the production manager that gave these documents to the -- to the guy who put the Truxor

together.
Q Okay. And are these documents, Defendant's Exhibits 17 and 18, records that are routinely kept in the ordinary course of Truxor's business?
A Yes.
Q And are they routinely made when selling a Truxor DM 5000?
A Yes.
Q And so these records are made at or near the date of the sale of the Truxor DM 5000?
A Yep.
Q And is the person who made and maintained these records a person who had knowledge of the information contained there in?
A Yes.
MR. YACKEY: Objection, form.
THE COURT REPORTER: I'm sorry. Is that Mr. Kella that's objecting?
MR. YACKEY: No. This is Mr. Yackey.
THE COURT REPORTER: Okay. Thank you.
MR. YACKEY: Can you hear me okay?
THE COURT REPORTER: Yep. It was just a little soft, so thank you.
Q (By Mr. Leach, continuing) And for Exhibits -- Defendant's Exhibits 17 and 18, are these documents

you're familiar with?
A Yes.
Q And documents that -- that you used while you were working --
A Yeah.
Q -- at Truxor?
A Yes.
Q And for Defendant's Exhibits 17 and 18, are these true and accurate copies of those documents?
A Yes, it is.
MR. YACKEY: Objection, speculation, lacks foundation.
Q (By Mr. Leach, continuing) And going back actually to Exhibit 15, which you said you created, is that a true and accurate copy of the document?
A Yes.
Q And for Defendant's Exhibit 16, is that a true and accurate copy of Truxor's retail price list for 2009?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And back to Defendant's Exhibits 17 and 18, were these documents obtained from the person who normally maintains these -- these documents for Truxor?
A Yeah.

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MR. YACKEY: Objects, lacks foundation.

Q (By Mr. Leach, continuing) Did -- did you obtain these documents, Defendant's Exhibits 17 and 18?

A No. I -- I -- I don't -- I don't put, what you say, the numbers in here, but --

Q No. You -- but did you -- did you reach out to the person that maintains them and did they provide them to you?

A Yeah, yeah, yes.

Q Okay. And -- and these are documents that Truxor would rely on in the ordinary course of its business?

A Yes.

Q And it would count on these documents to be accurate, correct?

A Yes, yes.

Q Okay. And the same is true for Defendant's Exhibit 15 and 16?

A Yes.

MR. YACKEY: Lacks foundation.

Q (By Mr. Leach, continuing) Was the Truxor DM 5000 amphibious tool carrier with the Doro pump advertised prior to 2013?

A Yes, it was.

Q And was it advertised -- well, tell me how it was advertised. Like, how was it -- how was it offered for

sale or promoted?

For example, did you have a website? Were there brochures provided to customers or dealers? Can you explain?

A Yes, we have the brochures every -- every year we -- they make a new brochure, and that was delivered to the retailers. And also some customers maybe contact Dorotea Mekaniska directly to get these brochures. And they are also in the -- on the Internet on the website, they can go in and look for themself and download these brochures.

Q Okay. And -- and all that was accessible prior to 2013?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) Can you tell me how you know all that was available prior to 2013 for the Truxor DM 5000?

A Yeah.

MR. YACKEY: Objection, vague.

A I was -- I was -- I was in the business. We usually talk about how it looks on the website and what will be in the website.

Q (By Mr. Leach, continuing) Did -- did you look at the website during that time prior to 2013 to confirm that the information was accurate that the marketing

department was using?
A Yes, yes.
Q What about for the brochures that were used? Did you review the brochures that were to be distributed or that were distributed prior to 2013 to confirm that they were accurate?
A Yes, I get -- I get a copy of the brochures, and they ask me to look and read and see if it was accurate.
Q And -- and did you provide some information to the marketing department of Truxor to -- to make the brochures?
A Yeah, it's -- much of the technical I have to provide them.
Q Did -- did you personally use the Truxor DM 5000 with the Doro pump prior to 2013?
A Yes, I have.
Q And would you say that you used it where it was open to the public to view?
A Yes, yes.
Q And were you involved in preparing the Truxor 5000 -- let me step back. Sometimes I say Truxor 5000 or Truxor DM 5000. Is there a difference?
A No. It's the same.
Q It's the same?
A Yeah.

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Q What does the DM stand for?
A I think it's the shortening of Dorotea Mekaniska.
Q Okay. So were you involved in preparing the Truxor 5000 with the Doro pump tool to be delivered to customers prior to 2013?
A Yes.
Q And are you confident that prior to 2013 the Truxor DM 5000 was -- with the Doro dredge pump was sold prior to 2013?
A Yes.
MR. YACKEY: Objection, lacks foundation, vague, speculation.
Q (By Mr. Leach, continuing) And -- and how do you know that?
A Well, I was -- how can I say how I know? That I was in the business and I saw when they deliver it out from the warehouse and --
Q To customers?
A Yes. And some customers -- you have maybe a Swedish customer, they come theirself with a trailer and pick it up and --
Q And you personally witnessed that happen?
A Yes, yes.
Q And -- strike that.
So I think we talked a little bit about you

providing information about the Truxor 5000 and its tools for -- for marketing literature.

What -- what types of information would you provide marketing that would be used in the marketing literature?

A Yeah, it's the specification maybe of the engine, how big it was, how powerful, and then even the -- the size of the hydraulic pumps and the hydraulic motors and so on.

Q Kind of the technical specifications?

A Yeah, technical specification, yes.

Q And I think we established that you reviewed those marketing brochures for accuracy?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) And did Truxor use their marketing brochures prior to 2013 to sell the Truxor DM 5000?

A Yep.

Q And were they --

MR. YACKEY: Objection, lack of foundation.

Q (By Mr. Leach, continuing) -- placed on Truxor's website?

A Yes.

Q Prior to 2013, did you see -- did you visit Truxor's

website to -- to see that the marketing brochures were -- were publicly available on the Internet --

A Yes, yes.

Q -- or on the website?

A Yes.

Q And could you down --

THE COURT REPORTER: Can I please have you repeat your objection? I just --

MR. YACKEY: Objection, vague, lacks foundation.

THE COURT REPORTER: Thank you.

Q (By Mr. Leach, continuing) And prior to 2013, could you download the Truxor brochures from Truxor's website?

A Yes, you can.

Q And --

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) -- specifically a Truxor brochure for the Truxor DM 5000?

A Yeah. I think they have special just for Truxor or maybe for the whole program. I'm not sure if it was specific just Truxor 5000, maybe the whole program.

Q And when you say the whole program, maybe the Truxor DM 4700 and the Truxor 5000?

A Yes, and -- and the tools, yes.

Q And the tools?

A Yes.
Q Okay. So I want to talk a little bit about the structure of the Truxor DM 5000.
(Deposition Exhibit 19 was marked for identification.)
Q (By Mr. Leach, continuing) And I'm handing you a document or a group of documents which are some photos that's marked as Defendant's Exhibit 19. And that's TRUX1 through TRUX8.
Can you please take a look at these and tell me what they are?
A Yes. Here we see the Truxor 5000 and the dredge pump in the front, and it's driven by the former owner Torbj rn Hallin. And it's -- it's in the -- it's in a lake just outside Dorotea. And he -- you see here he drive the Doro pump or dredging pump.
Q Okay. Can you look through all the photographs, please?
A Yes.
Q And do you -- do you know when these photographs were taken?
A Yeah, this was taken in 2009.
Q And you're specifically referencing TRUX1?
A Yeah.
Q Were the other photos taken in 2009 or before?
A I think the second one --

MR. YACKEY: Objection, foundation.

A -- is an older photo, because this is the 4700.

Q (By Mr. Leach, continuing) Okay. On the first page of Defendant's Exhibit 19, which is TRUX1, what is that a picture of? What vehicle?

A Yeah, this is the Truxor 5000.

Q How do you know that?

A Yeah. I see it on -- if you -- if you zoom in, it's a big blue Truxor it says on the -- on the hood; and underneath there, it's DM 5000 in blue text.

Q And you can recognize that this is the Truxor DM 5000 because you worked at Truxor and designed this vehicle and --

A Yes.

Q -- and serviced it and provided parts for it?

A Yeah, it couldn't be anything else but the Truxor 5000.

Q And are these photographs in DX 19 fair and accurate depictions of the Truxor vehicles?

A Yes.

Q And so I think you said -- let's just go through this. DX1 (sic) is the Truxor 5000, correct?

A Yes.

Q DX -- or, I'm sorry, the second page, TRUX2, is a photograph of the Truxor 4700?

A Yes.

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Q And then are the -- the TRUX3 and TRUX4, are those photographs of the Truxor 5000?
A Yes.
Q And what tool is being carried on the Truxor 5000 shown in the photographs of Defendant's Exhibit 19?
A Yeah, this is the hydraulic dredge pump in the front on the lift arm, and here is also the telescopic arm.
Q Okay. And how do you know these photos were taken in 2009?
A Yeah, it's because Truxor DM 5000 was developed in -- in that year, so --
Q Did you look at the metadata for the -- the -- the files for these photos?
A Yeah, and it says in the properties.
Q And what did the properties say?
A The properties say it was taken in 2009.
Q Okay. And that's for Truxor 1, Truxor 3, 4, 5, 6, 7, 8 --
A Yes.
Q -- of DX 19?
A Yes.
Q Can -- looking back at DX 19 and specifically Truxor 1 -- or TRUX1 for the Bates number, what -- what lake is this?
I see in the background there's some homes, it

looks like. Can you explain --
A Yeah, this is --
Q -- is this a public lake?
A Yes. As you'll see in the left of the photo, you'll see some floating bridges, so this is a swimming --
Q Oh, when you say floating bridges, do you mean docks -- like a dock?
A That you can walk out on, yes.
Q Okay. And so -- I'm sorry to interrupt, but can you keep continuing to explain where this is and -- and what's around?
A Yeah. This place -- lake is about maybe five kilometers east of the Dorotea.
Q Is this close to where Truxor the company is?
A Yes.
Q And -- and across the way, are those just houses or --
A Yeah, there's people that live there and also maybe some summer houses.
Q Okay. And -- and you've been here and you've seen this lake and --
A Yes.
Q And this is --
A Many times.
Q Okay. And, again, this is a fair and accurate depiction of what's shown in this -- this picture in Truxor 1 --

A Yeah.
Q -- or TRUX1 of DX 19?
A Yes.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) And -- and just to be clear, this is not -- this is not a private lake, this is a public lake?
A It's a public lake, Yes.
Q So people could be on shore swimming and watching --
A Yes.
Q -- the Truxor 5000 being operated?
A Yes.
Q Do you know, are -- are documents such as the photos in DX 19 prepared in the ordinary course of Truxor's business?
MR. YACKEY: Objection, speculation.
A Sorry?
Q (By Mr. Leach, continuing) When -- for example, when Truxor is -- is operating a vehicle or testing it or using it, did the company often take photographs to document --
A Yes, yes.
Q -- what was being done?
A Yes.
MR. YACKEY: Objection.

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Q (By Mr. Leach, continuing) Did -- did you ever take pictures of -- of the Truxor --
A Yes, yes, I did.
Q -- being used?
A Yes.
Q Okay. And --
A Maybe it could be me who hold the camera here, I don't know.
Q Okay.
A I don't remember. It could be.
Q But in any event, these are documents that would have been produced and kept in the ordinary course of Truxor's business?
A Yes.
Q And were these documents obtained from the person at Truxor that normally retains records, such as photos of -- of the Truxor 5000?
A Yep.
MR. YACKEY: Objection, vague, calls for speculation.
Q (By Mr. Leach, continuing) Did you obtain these photographs from -- from Truxor or the person that holds them at Truxor?
A I don't know how you mean. If I --
Q Did you ask for these documents for photos of the

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DM 5000?
A Yeah, I personally go -- go there and pull it out -- take it out for the -- from their data.
Q From Truxor's business?
A Yes, yes.
Q So you personally went to Truxor's business records or the files --
A Yes.
Q -- and -- and -- and obtained the photos in DX 19?
A Yes.
Q And those photos were where they're normally kept in the ordinary course of Truxor's business?
A Yeah. It's on the server --
Q Okay.
A -- yes.
Q And the photos in Defendant's Exhibit 19 are true and accurate copies of these records?
A Yes. And I think some of these photos maybe were used in the brochures, also.
Q If you turn to TRUX6 of Defendant's Exhibit 19, what -- what is that --
A This is --
Q -- showing?
A -- what you say, a typical how you use the dredge pump. You will take out the sediment from the water and maybe

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take it up on the land. And then we have these hoses -- flat hoses that we rolls out. And it could maybe be up to a hundred or 200 meters long hoses to -- to a place where the customer wants to get the sediments.

Q And -- and so what is the dredge pump do? Does it suck mud and slurry and -- and stuff off the bottom to make the water deeper there?

A Yes.

MR. YACKEY: Objection.

THE COURT REPORTER: What was the objection?

MR. YACKEY: Lacks foundation.

Q (By Mr. Leach, continuing) Have you actually operated a Truxor DM 5000 to dredge?

A Yeah, yeah.

Q And if -- if you turn to the next page of DX 19, which is TRUX7, what is that showing?

A Yeah, that's showing what -- what come -- come from the dredge pump through these hoses. The dredge pump take these from -- from the bottom.

Q And can you tell me what is it -- what is it pumping there?

A Yeah, it's some sediment. I don't know exactly what sediment, but maybe seem some -- it's some sand also in this.

Q Would this be a liquid with the suspended solids in it?

A Yeah.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) And so sand, silt, dirt, mud, clay?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) How do you know that in this photo it's showing the Truxor DM 5000 with a Doro pump pumping sand, sludge, mud?

A Yeah, because I've been there and seen how it looks and it looks like this, yeah.

Q And if you turn to the last page of Defendant's Exhibit 19, TRUX8, can you just explain what -- what that is showing?

A Yeah, this is -- when maybe the Truxor is away from -- from the land, then this hose that goes in the water between the Truxor and the land, because you have these floaters so the hose don't go down to the bottom. So it has to -- it stays on the -- on the water level.

Q Okay.

(Deposition Exhibits 20 and 21 were marked for identification.)

Q (By Mr. Leach, continuing) Mr. Olofsson, I'm handing you what's been marked as Defendant's Exhibit 20 and Defendant's Exhibit 21. And Defendant's Exhibit 20 is

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TRUX242, and Defendant's Exhibit 21 is TRUX243.

Can you please take a look at both of these exhibits?

MR. YACKEY: Tom, can you repeat the Bates number for the DX 20 again, please?

THE WITNESS: TRX --

MR. LEACH: TRX (sic) 240 --

THE WITNESS: -- 42 and 243.

MR. LEACH: 242.

Q (By Mr. Leach, continuing) And can you just tell me what DX 20 and DX 21 are?

A Yeah, these are typical setup with the Truxor DM 5000 and the dredge pump.

Q And what is the dredge pump on there? Is that the Doro pump?

A This is the Doro pump.

Q And is the Truxor 5000 shown in DX 20 and DX 21 a fair and accurate representation of the Truxor 5000 that was publicly used, sold, offered for sale prior to 2013?

A Yes.

MR. YACKEY: Objection, lacks foundation, vague.

Q (By Mr. Leach, continuing) How do you know that?

A Yeah, I know when the -- the Truxor 5000 start to produced and at the same time these dredge pumps was

produced.
Q And are you the person that helped build the Truxor 5000 and the dredge pump that goes along with it?
A Yes.
Q And you helped design it?
A Yep.
Q And so you're intimately familiar with the Truxor 5000 and its capabilities, correct?
A Yes.
Q And so can you explain, looking at DX 20, how -- how does the -- the -- the arm work, kind of the front bracket that holds the silver square tube that connects to the Doro pump, the dredge pump?
A Yeah, you see between the --
MR. YACKEY: Objection, vague.
A -- the dredge pump and the Doro -- DM 5000, you have a blue lift arm that you can lift whatever tools you connect to the lift arm. You can lift it up and down.
And then further to the -- to the dredge pump, you have a connection that we call the tilt, so you can also tilt the dredge pump forward and backwards.
Q (By Mr. Leach, continuing) And so would that blue arm shown in DX 20 in the front of the Truxor DM 5000, does that rotate on an axis connected to the -- the vehicle body?

A Yeah, it's the bolted --
MR. YACKEY: Objection --
A -- frame of the Truxor.
Q (By Mr. Leach, continuing) Okay. And what -- what makes it move? A hydraulic --
A It's a hydraulic cylinder, yes.
Q (By Mr. Leach, continuing) Okay. And can that arm go all the way vertical and all the way horizontal?
A Yeah, I think it just -- look at Page 21, you see it's maybe a little bit higher up the lift arm.
Q In DX 21?
A Yeah.
Q And how far down does -- will that bracket -- the blue bracket on the front of the Truxor 5000 go down? Will it go horizontal?
A Not -- it goes down -- I should say maybe as much up, it goes down from the horizontal down line, if you know what I mean.
Q So from the -- the deck of the Truxor 5000, what degree angle will it --
A Yeah --
Q -- go down to?
A -- I'd say maybe is it 45 degrees up and 45 degrees below?
Q Yes.

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A Yes.
Q Okay. Maybe I'm not tracking with you a little bit. Will it go up farther from that position?
A No. I think this is maybe the top.
Q And -- and you're looking at DX 21?
A Yep.
Q Okay. And then -- so how far -- how many degrees down would it go from the deck, do you think, the angle from the deck to the bottom bracket of the blue --
A I would say the same angle as it goes up from the deck, it goes beneath the deck also.
Q Will it lay flat on the deck -- go flat to the deck?
A It go farther down.
Q Oh, it goes -- oh, it goes down all the way?
A Yeah, it's at -- it's --
Q I see. When you said --
A -- maybe the same angle.
Q The same angle but beneath --
A Beneath --
Q -- the deck?
A -- the deck, yes.
Q Okay. Okay. So -- so from its position shown in DX 20, it would do that same angle but below the deck?
A Yes.
Q Okay. And then you also said that it can rotate the

silver square tubing that holds the Doro dredge pump back and forth.

About how far -- how many -- what degrees does it go back and forth to move the -- the dredge pump?

A Yeah, that --

Q Towards the vehicle or away from the vehicle?

A That --

MR. YACKEY: Objection, vague, lacks foundation.

A Both -- both towards the vehicle and away. We call it -- it's a tilt angle.

Q (By Mr. Leach, continuing) The tilt?

A Yes.

Q Do you know about how far it will tilt from -- from the straight vertical?

A Because it -- it depend on what -- what position the lift arm is. Because it's -- this is -- the lift arm is a unit together with the -- the tilt function.

Q Okay. And so the -- the --

A But if you just look at the -- if you say Page DX 20, I think you can -- you can tilt the dredge pump against to the Truxor, so it could go to the drive belt -- drive belts.

Q And so the tracks?

A To the tracks, yes.

Q Okay. And so looking at DX 20, could you position the dredge pump along the underside of the Truxor vehicle?
A Yep.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) And could -- could you tilt it and lower the -- the linkage -- the blue linkage such that the dredge pump is positioned along the underside of the Truxor vehicle and between the tracks?
A Yeah, if you --
MR. YACKEY: Objection --
A -- if it's in the water, yeah.
THE COURT: Can I have you repeat the objection? You were cut off.
MR. YACKEY: Objection, lacks foundation, speculation.
Q (By Mr. Leach, continuing) Sir, have you -- you designed the dredge pump. Did you design the bracket to that --
A Yes.
Q -- that attaches the dredge pump to the Truxor vehicle?
A Yes.
Q And so you know, because you designed it --
A Yeah.
Q -- how that functions, correct?
A Yeah, yeah.
Q Have you personally moved the bracket up and down and

its tilt to their full capacities --
A Yes.
Q -- to test them?
A Yes.
Q And have you done it with a Doro pump on it?
A Yes.
Q And have you moved it such that the Doro pump, while its floating, was positioned along the underside of the vehicle between the tracks?
A Yes.
Q What -- what drives the -- the -- what do the tracks ride on? What -- what drives them around?
A In the -- in the rear, you'll see a black hydraulic motor.
Q Okay. And then what -- what does that motor connect to?
A That's -- that's -- it's a roll chain. It connects to the drive wheel in the back.
Q And so is there a drive wheel in the back and in the front?
A Yeah, the front wheel is just --
Q Not powered?
A No, not powered, no.
Q Okay. And so the -- where is the drive wheel on the front when you're looking at DX 20?
A Just beneath the lift arm, the blue lift arm. The mod

guard -- silver mod guard.
Q Okay. And can you see the -- the axle?
A You see a little --
Q Gray box?
A -- blue -- blue bearing there.
Q Okay. Blue or gray bearing. Is it kind of the circular thing?
A Yeah, the circular thing in the middle is the axle from the -- the wheel.
Q Okay. And so when you -- strike that.

So have you personally moved the Doro pump to a position along the underside of the Truxor 5000 and between the wheel -- the drive wheels on the vehicle?
A Yeah, it's -- it's possible, yes. Of course I had -- I had to test it, yes.
Q Okay. And, again, are DX 20 and 21 fair and accurate representations of what they show?
A Yes.
Q And -- and that would be fair and accurate representations of the Truxor DM 5000 with the Doro dredge pump attached?
A Yes.
Q Can you describe the linkage that connects the Doro pump to the Truxor unit?

MR. YACKEY: Objection, vague.

Q (By Mr. Leach, continuing) Are there multiple bars connected by pivot points?

MR. YACKEY: Objection.

A You have -- in the -- the tilt function, if you see maybe in the No. 21.

Q (By Mr. Leach, continuing) And you're talking about DX 21?

A Yes. In the -- what you say, the tilt function up, there's a -- a round bar that goes -- that you hook up the dredge pump on and then you lower it down, and then you have some levers here -- silver levers that you put in to -- to connect this bracket to the tilt function.

Q Okay. And are there two hydraulic cylinders shown in DX 21? One that does the up and down of the linkage and one that does the tilt of the linkage?

A Yeah.

MR. YACKEY: Objection, vague.

A It's hydraulic cylinders, no motors.

Q (By Mr. Leach, continuing) Hydraulic cylinders?

A Cylinders, yes.

Q Okay. And those cylinders move the arm in and out to adjust the positioning of the bracket and thus the Doro pump?

MR. YACKEY: Objection, vague.

A Yeah, on the No. 21?

Q (By Mr. Leach, continuing) Yes.
A There is some -- you don't have the telescope there. This is the -- just the brackets --
Q Sure.
A -- that could not --
Q But I guess my question is does the -- I'm looking at the black tubular thing with the shiny silver tubular thing.
A Yeah.
Q Is that a hydraulic cylinder?
A That's the hydraulic cylinder --
Q And does that --
A -- for the lifting.
Q Does that move in and out to change the angle of the -- the linkage to the Doro pump?
MR. YACKEY: Objection, vague.
A Yes, you can say. But you have, also, the -- the tilt function and you have a tilt cylinder there.
Q (By Mr. Leach, continuing) Okay. And maybe we went over this, but DX 20 and 21, are those documents prepared and kept in the ordinary course of Truxor's business?
A Yes.
Q And they -- are they business records that are routinely made for advertising or for testing?
A For the brochures.

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Q Or for the brochures?
A Yes.
Q Okay. And, again, are the -- the Truxor DM 5000 depicted in Exhibit 21 and Defendant's Exhibit 20, are they fair and accurate representations?
A Yes.
Q And were these photographs, DX 21 and 20, obtained from Truxor's business records?
A Yep.
Q And did you obtain these documents?
A I think it was Torbj rn, the owner who -- who take these photos.
Q Okay. Who took them --
A I think they -- I think they used this in the brochures maybe.
Q Okay. And so when -- when you wanted to obtain these documents -- did you obtain these documents when they were -- when -- when we asked for them?
A Yes, yes.
Q And -- and did you go to Truxor's files?
A Yes.
Q And these documents were taken from Truxor's files --
A Yes.
Q -- by you?
A Yes.

Q And -- and these are files where these documents are kept in the normal course of Truxor's business?
A Yes.
MR. LEACH: Thank you.
(Deposition Exhibits 22-24 were marked for identification.)
Q (By Mr. Leach, continuing) Mr. Olofsson, I'm handing you what's been marked as Defendant's Exhibit 22, Defendant's Exhibit 23, and Defendant's Exhibit 24.
MR. LEACH: And just for the record, Defendant's Exhibit 22 is TRUX124, Defendant's Exhibit 23 is TRUX244, and Defendant's Exhibit 24 is Bates numbered TRUX241.
Q (By Mr. Leach, continuing) Can you please take a look at these documents for me?
A Um-hum.
Q Sorry. I gave you the wrong ones.
A Okay.
Q So there's that one.
MR. LEACH: Can I get another sticker, please?
THE COURT REPORTER: What number?
MR. LEACH: I just need another 23.
Q (By Mr. Leach, continuing) So, again, I've handed you Defendant's Exhibit 22, which is TRUX124; Defendant's Exhibit 23, which is TRUX244; and Defendant's

Exhibit 24, which is TRUX241.

Can you tell me generally what those documents are?

A Yeah, I don't know what could -- should we start with? What -- the other two are both -- 23 and 24, that shows the -- how the Truxor DM 5000, how it looks in -- from different engines.

And also in the DX 23, it says how steep the hill can be when you climb maximum from -- from -- and from -- if it tilts sideways.

Q Okay. And what are the date of these documents?

Let's start with DX 23, what -- what is the date on that document?

A The date is 25 of March 2011.

Q Okay. And what about the date on DX 24?

A It's the 28 of January 2011.

Q And did you prepare these documents?

A Yes.

Q And why did you prepare them?

A Just to show the -- say No. 24 is how -- general the size of the machine. And 23 is about what angles you can -- you can drive the machine before it get dangerous.

Q Okay. And were these documents prepared and kept in the ordinary course of Truxor's business?

A Yes.

Q Are these the type of records that were routinely made when designing a product such as the Truxor DM 5000?
A Yes.
MR. YACKEY: Objection, vague, speculation.
Q (By Mr. Leach, continuing) Are these business records made at or near the date of the drawing, the date shown on the drawing?
A Yeah.
Q For both -- those -- those questions relate to Defendant's Exhibit 23 and 24. And specifically, you created the engineering drawings for Defendant's Exhibit 23 and 24, correct?
A Yes.
Q And were these documents stored in Truxor's files?
A Yes.
Q And did you obtain Defendant's Exhibit 23 and 24 from those files?
A Yes.
Q And are these true and accurate copies of those records?
A Yes, yes.
Q Okay. Can you tell me what Defendant's Exhibit 22 is?
A Yeah, this is the -- what you say? -- the -- the pontoons that gives the -- the floating capacity of the Truxor.
Q And did you draw this document?

A Yes.
Q Okay. So is the same true for Defendant's Exhibit 22 as Defendant's Exhibit 23, in terms of you preparing them, they were kept in the ordinary course of business, and they're true and accurate copies of those doc -- of this document?
A Yes.
Q And, again, what is the date on Defendant's Exhibit 22?
A It's a date of 13 of November of 2012.

MR. LEACH: Okay. We've been going for about an hour and 45 minutes. Would you like to take a break?

THE WITNESS: That's okay for me.

MR. LEACH: Does anyone need a break? Okay. Let's go off the report.

VIDEOGRAPHER: The time is approximately 10:48 a.m. We're going off the record.

(A recess was taken.)

(Deposition Exhibit 25 was marked for identification.)

VIDEOGRAPHER: We are back on the record. The time is approximately 11:01 a.m.

Q (By Mr. Leach, continuing) Mr. Olofsson, we're coming back just from a quick break. I'm going to hand you what's been marked as Defendant's Exhibit 25, and it

starts with the Bates No. TRUX31 and ends with TRUX82.

Can you please take a look at this document? And can you tell me what this document is?

A Yeah. This is one thing of the complete, what you say, book that the -- the customer get for each Truxor 5000.

Q Okay. And -- and it's got some -- some different parts to it, correct? If -- if you look at the front page under "Color symbol for every section", do you -- do you see that? What -- are these just different parts -- or different documents that the customer gets?

A Yes, it's --

MR. YACKEY: Objection.

A In the -- in the upper right, you see different colors and names on -- on the sections.

Q (By Mr. Leach, continuing) And do those colors in the upper right-hand corner relate to the -- in the middle of the page, it kind of lists --

A Yeah, the colors --

Q -- what they are?

A Yeah.

Q Okay.

A Some symbols of the sections, yes.

Q And do some of these sections get updated individually?

A Yes.

Q And so could it be at times that the page numbers don't

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get updated quite right?
A Yeah, I think so, yes.
Q And so a section may add a few pages and then the section after it may then have redundant page numbers that are on the top right-hand corner of the document?
A Yes, it could be, yes.
Q Okay. And so what --
MR. YACKEY: Tom, could you --
Q (By Mr. Leach, continuing) -- what --
MR. YACKEY: -- point out an example of where -- where you see that there's a page number issue?
MR. LEACH: I think if you go between Service -- the last page of Service, so on -- or the last few pages of Service, TRUX74 is the Bates number, that's Page 44, and then it goes Page 45 and 46 under Service. So that's through TRUX76.
And then if you go to the next section, it's Technical Info, that is TRUX77 and it says Page 44.
Q (By Mr. Leach, continuing) And so that page number, Mr. Olofsson, may have not been updated when there was portions added to the Service section, correct?
A Yeah, maybe some -- some was added and some was taken out and that's what -- why the page numbers aren't accurate.

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Q And -- and in looking at Defendant's Exhibit 25, there's a date in the upper left-hand corner under Edition.

Do you see that?

A Yes.

Q And -- and every page has -- has a date on it. Can you -- can you tell me what that date means?

A Yeah, that's the date this -- or when it's -- maybe have been some update information about each page. And when the information was updated, then this edition number also would be updated.

So the customer -- if you talk to the customers, you maybe start to think -- look if -- so they look at the right edition of the page.

MR. YACKEY: So, Tom, I just want to get this on the record real quick. Is -- you know, these documents were produced to us yesterday afternoon.

Is -- is this document, DX25, is this a complete document as you received it? Or did you at Merchant & Gould compile this document from multiple other documents that were provided?

MR. LEACH: Well, I -- I spoke with Mr. Olofsson about it, and so I think there was -- I'd have to go back and look at what the -- the actual files were. We -- we sent the files that we received from Mr. Olofsson in the last --

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MR. YACKEY: So --

MR. LEACH: -- day or so to be processed, and so I'd have to look at that. But I think it was all this kind of operator manual-type sections got mixed up a little bit. And so with the help of Mr. Olofsson, we put them together.

MR. YACKEY: So was this -- am I understanding you correctly that this particular exhibit is a compilation of documents that you all put together?

MR. LEACH: I wouldn't -- I wouldn't say that. I would say that these documents came from Mr. Olofsson -- or Truxor, and they -- they were -- I guess I'd have to look. I think there was certain sections in -- in different -- in -- in -- maybe split up between two different -- or a few different documents.

But you have the original production, so you have it. So you can see that, you can look at it.

MR. YACKEY: So, yeah, but I guess I'm just confused. Like, right now we're referring to what appears to be -- or a single document.

And my question is was -- is this document -- was this single document produced to you by Mr. Olofsson? Or did you create this document from a compilation of other documents?

MR. LEACH: I did not create this document. Let's -- let's go on the record, we'll ask Mr. Olofsson, and you -- you can ask your questions later, but I want to keep moving.

MR. KELLA: Weren't you all just on the record?

THE COURT REPORTER: Yes.

MR. LEACH: Yeah, we are on the record. I guess what I'm saying is I want -- I want to keep moving. These were documents that were produced --

MR. KELLA: Tom, just -- just -- just for the record, though. You all noticed the deposition remotely. Pretty much encouraged us and told us -- asked us if we'd attend remotely.

MR. LEACH: Well, that's not true.

MR. KELLA: And then you all are now with your client in person taking a deposition. And, you know, implicit in the agreement is that we would have the exhibits. And there seems to be a disconnect now between what the witness is looking at, what we have on our end, what was produced, what the witness gave you, what you guys did with the documents before sending them as exhibits and producing them.

MR. LEACH: That's not true.

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MR. KELLA: So it's not -- it -- well, at least there seems --

MR. LEACH: First off --

MR. KELLA: Maybe, you know, it -- there's a lot of confusion on that. And, you know, I think there's got to be a standing objection here --

MR. LEACH: The confusion may be on your part, but it's not on mine.

MR. KELLA: -- on his testimony based on exhibits if -- if we don't have -- if Nuhn does not have, you know, a bona fide, you know -- you know, essentially prohibited from completely attending, completely preserving its objections in light of this, you know, what -- what seems to be kind of a one-sided advantage over here.

And -- and I -- you know, I want to apologize. I think for this deposition we -- we did accept the virtual option, but -- you know, and -- and that would seem to create even additional issue on -- on cross-examination, if -- if there's a disconnect in -- in pagination.

MR. LEACH: Okay. Well, the -- the depo was noticed up in person because you guys objected to certain remote depos. And so you were on notice since August that this was going forward in person,

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partly because of your objections to depositions. So to now complain that --

MR. KELLA: Tom --

MR. LEACH: -- you're --

MR. KELLA: -- I -- I -- I took back my point about the -- the virtual deposition.

MR. LEACH: Okay. Well, just so the record is clear on that, because that's frustrating to hear.

MR. KELLA: My -- my point -- my point is -- is -- relates to the exhibit.

MR. LEACH: Okay. Well, thanks. I'm going to keep going. You guys can make your objections, but -- but keep them to proper objections and not speaking objections.

Q (By Mr. Leach, continuing) So --

MR. KELLA: Well, it's geared towards trying to resolve. Anyway, okay.

Q (By Mr. Leach, continuing) Okay. Mr. Olofsson, sorry about all of that.

Looking at Defendant's Exhibit 25, which is TRUX31 Bates number through TRUX82, I think before we had that dialogue, you mentioned that this is kind of like an operator's manual or -- or sets of documents that get updated and provided to a user that purchases a Truxor DM 5000, correct?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) Okay. Can you generally tell me what is contained in this -- this group of documents or group of sections that are provided to a user?

For example, what is CE, what is Praxis, Service, Technical Info, Spare Parts? What -- what are those sections?

A Yeah, the first one, that CE, it's European requirements for CE marking the products. But there is some -- the first pages here is just something that I think have to be in every -- in every documents due to this EU, Europe standard.

Q Okay. And what is the -- it says Praxis, P-r-a-x-i-s. What -- what is that?

A Yeah, that's some information for the customer that shows how you -- what you say, you use the machine.

Q Okay. And then Service is the next kind of triangular -- or flag?

A Yeah, I think you can recognize that this is just for what it says, it's the maintenance and service of the machine, how you should do and what you should think about.

Q And are -- are these sections at time updated individually?

A Yes.
Q So they're kind of each as a separate document or section that's -- that's put together and provided to the user --
A Yes.
Q -- when they buy a Truxor --
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) -- when they buy a Truxor DM 5000?
A Yes.
Q How are you familiar with Defendant's Exhibit 25?
A Yeah, I have been involved with -- for making some specifications. And then when the -- all this are -- have been done, I have -- get -- get a copy and -- and I look it through and see what I have -- if I have any opinion of something that would be changed.
Q And when you say opinion of something should be changed, if you have any comments or -- or -- or suggestions or changes to it; is that correct?
A Yes.
Q So would it be fair to say that you helped prepare the document DX25?
A Yes.
Q And is DX25 a fair and accurate representation of documentation that's provided to users that purchase the

Truxor DM 5000?
A Yes.
Q Or purchasers of the DX -- I'm sorry, DM 5000?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) Have you personally seen this document provided to purchasers of the Truxor DM 5000 prior to 2013?
A Yes.
Q And is that in a situation maybe where -- well -- well, tell me in what situation would -- would you see that? Is that maybe where a customer picks one up?
A Yes. And also in the warehouse when they put -- put every parts, they belong to this order, they have this on the -- usually on the seat -- driver's seat they would put that.
Q What -- what would it look like?
A It would -- in what you call the --
Q A three-ring binder --
A Yeah.
Q -- is that what you're pointing to?
A Yes, together with all the documents. But you see here it's the spare parts also should be in.
Q Okay. Well, we actually have that. And so I will mark Defendant's Exhibit 26.

(Deposition Exhibit 26 was marked for identification.)

MR. LEACH: And Defendant's Exhibit 26 is TRUX125 through TRUX166.

Q (By Mr. Leach, continuing) Mr. Olofsson, can you please look at this and tell me if this is the spare parts document for the Truxor DM 5000?

MR. YACKEY: Objection, lacks foundation.

A Yes, this is a complete document of the spare parts to Truxor DM 5000.

Q (By Mr. Leach, continuing) And how do you know that's what this document is?

A Yeah, I -- those -- all those, what you see, images and folders in this spare part, it came from my 3D drawings, so I have produced these -- these photos.

Q So did you help prepare Defendant's Exhibit 26?

A Yeah. I made it.

Q You made Defendant's Exhibit 26?

A Yes.

Q And is this a document that was -- well, is Defendant's Exhibit 26 a true and accurate copy of Truxor's spare parts list for the Truxor DM 5000?

A Yes.

Q And, again, this was a document that was created and provided with the Truxor DM 5000 that was sold prior to

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2013, correct?
A Yes.
MR. YACKEY: Lacks foundation.
Q (By Mr. Leach, continuing) And one -- if you look at DX 26, in the upper left-hand corner where it says Edition, there's a date there.
A Yeah.
Q And what is that date?
A Yeah, this date is, what do you say, the last update of the -- this picture. If it -- if I make an update on each side, then I update even the edition number there.
Q Okay. And so each page of DX 26 is -- has its -- may have its own date?
A Yes.
Q And that date represents when it was last updated?
A Yep.
Q Okay. And does DX 26, is that provided with DX 25 in -- in the binder of documents that go with the Truxor DM 5000 when it's sold?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And, again, you know this -- tell me how you know that -- that DX 25 and 26 were provided to customers that purchased the Truxor DM 5000 prior to 2013?

A Yeah, I've seen these complete catalogs made and delivered to the customers.
Q Okay. And that was prior to 2013?
A Yes.
Q And -- and you personally saw them put together, set on the seat of the DM 5000, and provided to the customer?
A Yes.
Q And so would Defendant's Exhibit 25 be in the binder kind of next to or -- or on top of Defendant's Exhibit 26?
A Yes.
Q Is that kind of how it would go with -- with all those parts?
A Yes, under -- underneath this --
Q Okay.
A In this order, 25 and --
Q 26.
A -- 24.
Q Okay. And you can see that on the first page of Defendant's Exhibit 25 in where kind of lists the CE, Praxis, Service, Technical Info, and Spare Parts?
A Yes. In that order, yes.
Q In that order, okay.
And, again, there may be some page discrepancies, because these sections or these -- these documents

are -- are updated separately and then inserted into the -- the binder?

A Yes.

Q Okay. And so going back to Defendant's Exhibit 26, is this a document you prepared and kept in the ordinary course of Truxor's business?

A Yes.

Q And is Defendant's Exhibit 26 a record that is routinely made when designing a product such as the Truxor DM 5000?

A Yes.

Q And was this document made at or near the date of the various drawings showing in it when they were prepared?

A Yeah.

Q And that's shown by the --

MR. YACKEY: Objection --

Q (By Mr. Leach, continuing) And that's shown by the edition date on the front left-hand -- or the top left-hand corner of -- of each page --

A Yes.

Q -- of Defendant's Exhibit 26?

A Yes.

Q And so you created Defendant's Exhibit 26?

A Yep.

Q And you were involved in the creation of Defendant's

Exhibit 25?
A Yes.
Q Who was the other person that helped create Defendant's Exhibit 25?
A 25, it would be the owner, Torbj rn Hallin.
Q Okay. And for Defendant's Exhibit 26 and 25, are these true and accurate copies of the owner's manual for Defendant's Exhibit 25 and -- and the portion that's the spare parts list for Exhib -- Defendant's Exhibit 26?
A Yes.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) And does Defendant's Exhibit 26 accurately reflect the parts of the Truxor DM 5000 that was sold prior to 2013?
A Yes.
Q And are the -- the pages that have the edition number and the date -- or the edition date, I'm sorry, in the upper left-hand corner, does that reflect what the Truxor DM 5000 looked like for each part or group of parts at that date?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And how do you know that?
A Yeah, because that was the -- the routine that we have. If anything was changed in the information on the page,

then also these edition numbers are changed at the same time.

Q And -- and so were you one of the people involved with maybe updating or -- or making a change to the Truxor DM 5000?

A Yeah.

Q And if you made a change to the Truxor DM 5000, would that be reflected in this spare parts shown -- document shown in Defendant's Exhibit 26?

A Yes.

Q And just to be clear, Defendant's Exhibit 26 is a document prepared and kept in the ordinary course of Truxor's business, correct?

A Yes.

Q And this is a record that is routinely made or updated to provide information about the parts of the Truxor DM 5000?

A Yes.

Q And you created Defendant's Exhibit 26?

A Yes.

Q And did you obtain Defendant's Exhibit 26 from Truxor's records?

A Yeah.

Q And was it stored at the same place that you stored it?

A Yes.

Q And for Defendant's Exhibit 25 and 26, were -- were you the one responsible for these documents?
A For 26, yes.
Q And so who was responsible for Defendant's Exhibit 25?
A It would be the owner, Torbj rn.
Q Okay. But, again, for Defendant's Exhibit 25, you helped prepare this document, as well?
A Yes.
Q And was Defendant's Exhibit 25 kept in the ordinary course of business?
A Yep.
Q And did you obtain it from Truxor's records?
A Yes.
Q And it's a true and accurate copy of the owner's manual?
A Yes.
Q Okay. If you turn to TRUX156 of Defendant's Exhibit 26, can you tell me what's shown on that page?
MR. YACKEY: Objection, vague.
A Yeah. In the upper picture, you see Position No. 1, this is the lift arm. And Position No. 5 is the tilt -- tilt bracket, as you called it. And underneath you have two cylinders. To the left, you have the lift cylinders that lift the lift arm against -- from the frame of the Truxor 5000. And then to the right, we have the tilt cylinder that adjust the -- this quick bracket or tilt

bracket due to the arms -- to the lift arm.
Q (By Mr. Leach, continuing) And is the lift arm shown in TRUX156 of DX 26 a drawing of the lift arm that we talked about in Defendant's Exhibit 20 and 21?
MR. YACKEY: Objection, vague, lacks foundation.
A Yes, it's the same.
Q (By Mr. Leach, continuing) And how do you know it's the same?
A Yeah, because I -- I make all the drawings for this and I see on the picture that it's -- this is the right thing.
Q If you'd turn to TRUX158, which is in DX 26, can you tell me what that's showing?
A Yeah, that upper picture is the pontoon, the floating part of the Truxor. And this is one -- just one piece. It is -- it is two of these pieces on the complete Truxor DM 5000.
Q Okay. And what's shown in the bottom portion of TRUX158 of Defendant's Exhibit 26?
A Yeah, this is the bilge pump that we mount inside this pontoon.
Q And what does the bilge pump to?
A In case of any water comes into the pontoon, there is a weight so it goes deeper Truxor in the water. And the

maneuverability is not the same when -- when you get water in.

So with this electrical bilge pump, you pump up the -- pump out the water that is in the pontoon.

Q Did you consider any other options aside from the bilge pump to -- to try to keep water out of the pontoon or to keep the pontoon floating if it -- if it got punctured?

A Yeah, we have discussed if -- maybe fill it up with some material that can -- that not absorb water itself.

Q Like what kind of material?

A Yeah, what you call -- what's the name? The same as you maybe have in the floating decks or pontoons.

Q Like a foam?

A Yeah, it's a foam or -- but we -- we never tried it, we just talk about this. So we -- we never decide what -- what we use -- really could use, but --

Q Would you consider using a bilge pump or foam just design choices that an ordinary engineer would consider when -- when looking at the pontoons and -- and trying to make sure they stay afloat?

A Yeah.

MR. YACKEY: Objection, vague, lacks foundation, calls for speculation.

A One thing that is important for us is the weight. Keep it as light as possible. And if you should put in some

floatings in the pontoons, we increase the weight, total weight. So for that case, it -- we -- we take to go in with the bilge pump instead.

Q (By Mr. Leach, continuing) Okay. But do you agree you -- you considered both options; and -- and for whatever the pros and cons, you tried -- you decided to go with the bilge pump rather than filling the pontoons with foam; is that correct?

A Yes.

Q Okay. And -- and part of the reason you went with the bilge pump is because you were concerned about the weight of the vehicle?

A Yeah.

Q Okay. If you turn to TRUX166, which is the Bates number on the bottom right-hand corner, and it's Page 42 of the document DX 26, what does that show?

A Yeah, that shows the control unit complete with the joysticks for left and right joystick. And we also have this control box that is type of computer that is programmed.

So seeing this, the control box gets the signal from the joysticks, and then the control box put out another signal to the valves that operate the drive bands and all the hydraulic outlets.

Q And the hydraulic outlets, what are they connected to?

A Yeah, you have three main outlets. The one -- the biggest outlet goes to the dredge pump, and then you have two other small -- smaller outlets if you connect a cutter and depending on, yeah, what tools you have in the lift arm.

Q Okay.

(Deposition Exhibit 27 was marked for identification.)

Q (By Mr. Leach, continuing) Mr. Olofsson, I'm handing you what's been marked as Defendant's Exhibit 27.

MR. LEACH: And, Scott, this is -- this actually, I think, is the document I might have been referring to that had different Bates numbers that -- that were -- were out of order. Maybe I made a mistake on the other ones; 'cause now that I look at it, this -- this one has not sequential, I think, Bates numbers.

MR. YACKEY: Okay.

Q (By Mr. Leach, continuing) But, Mr. Olofsson, can you look at Defendant's Exhibit 27 and tell me what that document is?

MR. YACKEY: Hey, Tom, before -- which -- what -- are you referring to a file name? Like, do you have a file name --

THE WITNESS: Oh, yeah, yeah.

MR. YACKEY: -- associated with what this exhibit is?

MR. LEACH: Sorry. Let -- let me give you that. Do you see one in the folder that we sent that says Tools and Accessories?

MR. YACKEY: Yes.

MR. LEACH: Pull that up and see if the first Bates number is TRUX198.

MR. YACKEY: Give me one moment. TRUX198?

MR. LEACH: Yes.

MR. YACKEY: Yes. And you said you think that there may be some non-sequential numbers here?

MR. LEACH: Well, I think the Bates numbers are non-sequential, but the page numbers for this document, I think, are sequential. This -- I'm sorry. This is the document I was talking about, I believe.

Q (By Mr. Leach, continuing) And so, Mr. Olofsson, if you could just look at Defendant's Exhibit 27 and confirm that this is the -- the part -- or one of the documents that was provided with the Truxor DM 5000 for the -- the spare parts for the tools and accessories.

A Yes, this is --

MR. YACKEY: Objection, lacks foundation.

A -- this is the spare part list of the tools that you can

buy to use on Truxor DM 5000.

Q (By Mr. Leach, continuing) Okay.

A And even -- you can -- some of them you can also use on the -- the 4700.

Q Okay. And did you prepare this document?

A Yes.

Q And so you're familiar with this document because you prepared it, correct?

A Yes.

Q And can you just look through it and confirm that it's a -- it's a complete document?

A This is the complete document for all the tools, yes.

Q Okay.

MR. YACKEY: So, Tom, you -- you mentioned there's some -- some error in the page numbers. Can you identify --

MR. LEACH: No, no. Sorry. Not errors in the page numbers, errors in the Bates -- the Bates numbers -- how they were Bates numbered. They're -- they're not sequential. They -- they were Bates numbered out of order, and I'm not sure what happened.

MR. YACKEY: Can you -- can you tell me which -- which Bates numbers are out of order?

MR. LEACH: Well, you -- yo u can look through

the document and see that it's not sequential Bates numbers. But the page numbers in the document in the upper right-hand oval that says Spare Parts for Tools and Accessories, that's all consistent, so --

MR. YACKEY: Okay. So if I go to the -- the upper right-hand corner, I see Page 35 in the box, and that's Bates labeled TRUX232?

MR. LEACH: Yep.

MR. YACKEY: Then I go to Page 36, which is on the right-hand -- top right-hand corner, and I see TRUX174?

MR. LEACH: Yep.

MR. YACKEY: So is this a -- is this document that he's looking at a compilation of separate documents that you all put together and that's why the Bates numbers are non-sequential?

MR. LEACH: I -- I don't believe so. I -- I think they -- they produced a chunk of documents that were -- I'm not sure how they were --

Q (By Mr. Leach, continuing) Maybe, Mr. Olofsson, do you -- do you know -- in some of the documents that were provided to us, they were maybe out of order. Could that have been -- could they have been scanned in out of order, or -- or do you know why maybe the -- the chunks of them may have been --

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A I just can't explain just this. But it could be something about -- also this spare part tools document is also for the 4700 machine also and for the DM 5000. So if it's something that could have with that to do (sic).
Q Okay. But -- but in any event, you've looked through Defendant's Exhibit 27. And setting the Bates numbers aside --
A Um-hum.
Q -- you prepared Defendant's Exhibit 27, and this looks like a complete and accurate spare parts document for the tools and accessories for the DM -- the Truxor DM 5000, correct?
A Yes.
Q Okay. If you turn to -- let's see. Can you -- can you tell me what this document was used for?
A Yeah, it goes together with the instruction book to the customer so he can -- when something broke, they can call and tell that I need this part number to get my tools working.
Q Okay. And does Defendant's Exhibit 27 accurately -- accurately reflect the parts of the Truxor DM 5000 tools and accessories that were available for use with the Truxor DM 5000 prior to 2013?
A Yes.

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Q And, again, if you look at the upper left-hand corner of DX 27, on each page there's an edition and then a date.
A Yes.
Q Do you see that?
And, again, is -- is the date, for example, on the first page, DX 27, where it says 10-11-16, what does that stand for?
A Yeah, that stands for when this page was updated.
Q And what does the date stand for -- or what does that number stand for?
A Yeah, when the changes was done in the -- for this.
Q I guess I'm asking is that a date?
A Yeah, that is a date, yeah.
Q And what is the date on DX 27, the first page TRUX198?
A Yeah, the 16th of November in 2010.
Q Okay. And that same format carries through the entirety of DX 27?
A Yes.
Q So -- and, again, you prepared DX 27?
A Yes.
Q And this is a true and accurate copy of Truxor's spare parts list for its tools and accessories prior to 2013?
A Yes.
Q And this document was prepared and kept in the ordinary course of Truxor's business?

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A Yes.
Q And --
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And was DX 27 a document or a business record that was routinely made when designing a product such as the Truxor DM 5000 and its related tools and accessories?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And you know that because you're the one that was responsible for DX 27 and updating it, correct?
A Yes.
Q And was DX 27 a business record of Truxor that was made at or near the date of the drawings showing in the document?
A Yes.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) And I guess specifically it -- it provides the dates on each page when that page was updated, correct?
A Yes.
Q And did you obtain Defendant's Exhibit 27 from Truxor's records?
A Yes.

Q And you obtained it from where it was normally stored on -- in Truxor's files?
A Yes.
Q And this is a true and accurate copy of the tools and accessories spare parts for the Truxor DM 5000?
A Yes.
Q If you'd turn to Page 36 of DX 27, and the page number in the upper right-hand corner of document, and it's Bates No. TRUX174.

Can you tell me what that document is?

A Yeah, this shows the parts -- if you buy the dredge pump, these parts would be in this package you buy.
Q Okay. And if you look at the Table of Con -- at the top it says Table of Contents, dredge pump hydraulic.
A Yep.
Q If you go to the left there, it says Edition. What was the date this was last updated?
A 24th November, 2010.
Q Okay. And if you go down to the table, what -- what does that table show on the bottom?
A Yeah, the table just show what -- what page you can look to and explore the view of -- of every part.
Q Okay. And does it describe -- so, for example, if it says POS and then there's a 1 underneath it, what is that?

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A The position balloons in this drawing.
Q Okay. So that one corresponds to the one with a circle on it?
A Yes.
Q And that's referring to pump housing with accessories; is that correct?
A Yes.
Q And that's under Description?
A Yep.
Q And does that carry -- that -- that format carry throughout this document?
A Yeah.
Q And if you look where it says Page No. 37, does that show an exploded view of the pump housing with accessories?
A Yes.
Q And so if you turn to the next page, Page 37 of DX 27, and that's TRUX175, does that provide an exploded view of all the parts of the dredge pump for the Truxor DM 5000?
A Yes.
Q And -- and that's dated as of 2010?
A Yeah, 16 December 2010.
Q Thank you.
What is the bubble or the circle with the 21 in it?

What is that pointing to?
A Yeah, that's pointing to what we call the pump wheels.
Q And is that the pump impeller?
A Yes.
Q And what is No. 2 -- Reference No. 2 pointing to?
A Yeah, it's pointing to the hydraulic motor that drives the impeller.
Q And how does the hydraulic motor drive the impeller?
A Yeah, it's -- the hydraulic motor is connected with a shaft down to the impeller.
Q And is the --
A Mechanical --
Q Go ahead.
A It's a mechanical, it's bearings there. And these impellers you can change. You see, it's -- it's about five impellers, it's stocked -- packed together so you can change -- if these just wear out, you can change -- change.
Q And -- and why would the impellers wear out?
A Yeah, because we -- the sediment we pump, it's usually stones and sand, and that makes it -- it wear out very quickly.
Q Okay. And so is the hydraulic motor, I think you just mentioned, connected to the impeller via the drive shaft? Is that a 15, Reference No. 15?

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A Yes.
Q Or is -- what does PO stand for in the -- in that chart? At the very top it says PO and then lists the numbers.
A That's position.
Q Oh, position. Okay.
A Yeah, the position balloons.
Q Position balloons, okay.
And then quantity is the number of them?
A Yeah.
Q And the part number?
A It's a spare part number. If you will order a spare part, you reference that.
Q And so customers would use this to call in and possibly order --
A Yeah.
Q -- parts?
A Yes.
Q And then the des --
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And then the description?
A Yeah, it generally say what -- what type of part it is.
Q Okay. If you'd turn to the next page of Defendant's Exhibit 27, which is TRUX176, can you tell me what that shows?
A Yeah, that's something that we call the feeding wheel.

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That -- that has, also, hydraulic motors that's connected to these wheels with a shaft.

And the -- when we dredge, it depend on the surface that -- if it's hard or if it's soft. Maybe if it's very soft, you don't need these -- these wheels, feeding wheels. But if it's hard, you have to scratch the surface to make it softer so the pump can suck it up.

Q Okay. And so would -- where would this be positioned on the Doro -- is it positioned on the Doro pump?

A Yeah. You'll see -- in Page 36, you'll see it's connected underneath the intake of the pump.

Q Okay. And if you turn to the next page, on Page 39 of DX 27, what is that showing?

A Yeah, this is -- this is the bracket that connects the -- the Doro pump through to the lift arm of the DM 5000.

Q Okay. And that's shown on Page 39?

A Yes.

Q And then if you turn to Page 40, what is that showing?

A This is an extension you can connect between the first bracket and the pump so you can go deeper to dredge.

Q Does this allow the Doro pump to raise and lower telescopically?

A No. This -- this -- the telescope is another --

Q Another part?

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A Yes.
Q Okay. So this is just a -- a stationary extension --
A Yes.
Q -- for the Doro pump?
A Yes.
Q Okay. If you turn to Page 41 of DX 27, what is the top component there?
A Yeah. This is what we call the cutting device. You have cutting edges which is mounted on this plate, and then you have -- if you go back to Page No. 37, you have the Position No. 22 called the feeding wing. That feeding wing goes near these cutting edges.

So if it comes to some -- some wooden or something, it cuts it to smaller pieces so the dredge pump can pump it up.

Q Okay. And so would it cut up wood pieces, straw --
A Yes.
Q -- grass?
A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) Well, sir, you -- you designed this component, right?
A Yeah.
Q And so the purpose of designing it was so it could pump sediment and sludge that had wood chunks, straw, grass,

correct?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) Let's talk about the Doro pump that was sold with the Truxor DM 5000.

Could the Doro pump pump liquid with suspended solids?

A Yeah.

MR. YACKEY: Objection, vague, lacks foundation.

A Yes.

Q (By Mr. Leach, continuing) Could it pump a liquid that had a total solid content of about less than five percent?

MR. YACKEY: Objection, vague, lacks foundation.

A Yes, it could.

Q (By Mr. Leach, continuing) And about how much total solid content could -- a liquid with a total solid content percentage could the Doro pump pump?

MR. YACKEY: Lacks foundation, vague.

A Yeah, I think we -- they have make some test driving in Germany. And there they have noticed about 18 percent of sediment in -- just in that time of testing.

Q (By Mr. Leach, continuing) And was that prior to 2013?

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MR. YACKEY: Objection, lacks foundation.

A No. I think that was later.

Q (By Mr. Leach, continuing) Okay.

A But it's the same --

Q Was it the same pump?

A Yes, it's the same pump.

Q Okay. And so the Doro pump that was sold with the Truxor DM 5000 prior to 2013, could that pump a slurry of liquid with suspended solids?

A Yeah, yeah.

Q Could it --

MR. YACKEY: Objection, vague, lacks foundation, calls for speculation.

Q (By Mr. Leach, continuing) Could it pump a -- a thicker mud?

MR. YACKEY: Objection, vague, lacks foundation, calls for speculation.

Q (By Mr. Leach, continuing) Well, strike that.

Going back to the total percent solid content, you designed the Doro pump, right?

A Yep.

Q And you designed it to pump -- pump liquids with suspended solids, correct?

A Yeah.

Q And you designed it to pump liquid with suspended solids

up to about what percent water and suspended solids?
A It's difficult to say how much, because the -- if it is a hard sediment or -- and you have -- must have water also to transport the sediment.
Q Um-hum.
A So I think maybe up to 30 percent I would say it would be no problem.
Q Okay. Have you -- would the Doro pump pump liquid manure?
A No, I haven't --
Q No. I said do you believe the Doro pump --
A Yeah.
Q -- would pump liquid manure?
A Yes, it could, no problem.
Q Okay. And have you looked at videos of manure lagoons and -- and equipment pumping liquid manure?
A Yep.
Q And did that give --
MR. YACKEY: Objection, vague, lacks foundation.
Q (By Mr. Leach, continuing) And did that give you an idea of what the consistency was of at least some forms of liquid manure?
A Yeah.
MR. YACKEY: Objection, vague, lacks

foundation.

Q (By Mr. Leach, continuing) And do you believe that the Doro pump could easily pump liquid manure?

A Yes, no problem.

MR. YACKEY: Objection, vague, lacks foundation.

Q (By Mr. Leach, continuing) And why do you believe that?

A Yeah, but you see it's much liquid, much water in it, so it's not -- it's not -- not -- no -- you don't have to use so much real power if it's not so much sediment in it, so --

Q Okay. And -- and you -- did you design the Doro pump to -- to pump thicker sediment from the bottom of ponds and -- and -- and ditches?

A Yeah, that's what the purpose of it is.

MR. YACKEY: Objection, vague, lacks foundation.

Q (By Mr. Leach, continuing) Okay. And have you seen the Doro pump actually pump liquids with suspended solids?

A Yes.

Q And you've operated --

MR. YACKEY: Objection, vague.

Q (By Mr. Leach, continuing) -- you've operated the Truxor 5000 with the Doro pump to pump liquid -- liquids with suspended solids?

A Yes.
Q Okay. If you -- going back to Defendant's Exhibit 27, can you look at Page 42 where it's titled Feeding Screw and -- and tell me what that device is?
A Yeah, this is a feeding screw that -- that -- it function better than the feeding wheel. So later this feeding wheel goes out from -- from the production, so it's only now the feeding screw that -- and that rotates and it takes the -- the sediment to the middle just below the intake of the mudder pump.
Q Okay. And so would the -- the feeding screw -- I guess, are you testifying that the feeding screw would -- would move the sludge or silt or sand into -- feed it into the pump --
A Yes.
Q -- so it could pump it?
A Yes.
Q And -- and that's -- this would be attached to the Doro pump on the Truxor DM 5000?
A Yes.
Q And -- and have you seen the feeding screw operate with the Doro pump on the Truxor DM 5000 prior to 2013?
A Yeah, yeah.
Q And has Truxor sold, prior to 2013, a Truxor DM 5000 with a Doro pump and -- and the feeding screw?

A Yes, prior to it --
MR. YACKEY: Objection.
A -- we saw this delivery to U.S. and this was the combination.
Q (By Mr. Leach, continuing) Ah, I see.
Okay. And -- and you're referring back to --
A Yes.
Q -- DX 17 on Page BAZ15_0026664?
A Yeah.
Q Let me ask you this: Was all the parts -- or all the tools and accessories shown in DX 27 offered for sale prior to 2013?
A Yes.
Q If you turn to Page 51 of DX 27, can you tell me what the bottom device is?
A Yeah, this is a bottom device that we use with the -- the earlier type of dredge pump when we have the engine on top.
Q And so was this with the DM --
A 4700, yeah.
Q -- 4700, okay?
A So this is -- this construction is not totally our own. This -- where we buy the components -- part of components from TILLV.NR.
Q Okay. And so going back to Page 42 of DX 27, the

feeding screw, that -- that device you designed to work with the Doro pump, which you also designed to be used as a dredge pump for the Truxor DM 5000, correct?

A Yes.

MR. LEACH: Can we go off the record for just a second?

VIDEOGRAPHER: Yeah. The time is approximately 12:03 p.m. and we're going off the record.

(A lunch recess was taken.)

(Deposition Exhibits 28-30 were marked for identification.)

VIDEOGRAPHER: We're back on the record. The time is approximately 12:46 p.m.

Q (By Mr. Leach, continuing) Mr. Olofsson, welcome back. We're back from our lunch break.

Talking about the Truxor DM 5000, did -- did Truxor ever make a remote control version of its Truxor DM 5000 prior to 2013?

A Yes, they -- we make a prototype for test driving.

Q And was the remote control version of the Truxor DM 5000 publicly used prior to 2013?

A Yes.

Q Can you tell me how you know that it was built and publicly used prior to 2013?

A Yeah, we have some email conversation to our supplier

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and also a -- a film that shows when we drive the Truxor.

Q Okay. So let me -- let me mark some exhibits. I'm marking Defendant's Exhibit 28, Defendant's Exhibit 29, and Defendant's Exhibit 30.

I'm going to hand you what's been marked as Defendant's Exhibit 28, which is Bates numbered TRUX255, 256, and 257.

Mr. Olofsson, if you could please take a look at this and tell me what this document is.

A Yeah, this is a conversation between one of my colleagues called Erik Nilsson, who is now sitting on technical support. And this email conversation is to one of our hydraulic supplier. And in this email, it's mention about the -- the things to need to make Truxor DM 5000 remote controlled and also documents that shows the control unit that we later on drive -- yeah, drive the Truxor DM 5000 with.

Q Okay. And so looking at DX 28, you recall that Truxor made a remote control version of the Truxor DM 5000, right?

A Yes.

Q And you reached out to -- who -- who is the person you reached out? Is it Mr. Nilsson?

A Mr. Erik Nilsson. Mr. Nilsson, yes.

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Q Okay. And -- and is he -- is he the person that would have had the documents related to the remote control unit?
A Yeah.
Q And -- and did he obtain those documents from -- I'm sorry. And -- and is he the one that, I guess, would -- would have control of the documents related to the remote control on the Truxor DM 5000?
A Yeah.
Q And did he provide an email from 2010 related to putting remote control on the Truxor DM 5000?
A Yes. As we can see here, the date -- this email is dated 16 December 2010.
Q And you're referring to the email --
A The email.
Q -- in DX 28?
A Yes.
Q And can you tell me generally what the email that Truxor received in December of 2010 about the remote control for the DM 5000?
A What they speak about here?
Q Yes.
A Okay. Yeah. Yeah, they --
MR. YACKEY: Note an objection that this email is -- does not appear to be in English.

THE WITNESS: No. This is in -- the text is in Swedish, so I try to adjust -- to translate what -- generally what it say, if it's okay.

MR. YACKEY: Go ahead.

A Yeah. It say that for drive this Truxor with the -- the radio, we need to connect it to a radio receiver to the -- to the ordinary what we call STU, the control box for driving the -- the Truxor.

Q (By Mr. Leach, continuing) And let me just slow you down.

Is the -- the control box, that was already on the Truxor unit that was receiving input from the joysticks, correct?

A Yes.

Q And so is what Truxor had to do -- and correct me if I'm wrong -- but just connect the radio control with the right program to control the computer on board -- that was already on board the Truxor --

A Yes.

Q -- receiving input from the joysticks to -- to switch to receive input from the radio control?

A Yeah, that's --

MR. YACKEY: Objection, lacks foundation, calls for speculation.

A Yeah, that's -- that's how we -- you have to do. You

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have to disconnect the -- the joysticks and then you drive it with the -- the remote control panel.

Q (By Mr. Leach, continuing) Okay. And were you involved in making it, the Truxor DM 5000, remote control at all?

A Not -- I just -- we're there and look when they drive, but I was not involved with the installation and that.

Q Okay. But when you say you were there when they drove it, were you there when they were driving it using the remote control?

A Yes.

Q And when I say "it", I mean the Truxor DM 5000.

A Yes.

Q And do you know about what year that was?

A Yeah, it have to be in the beginning of 2011, I think.

Q Okay. And is Defendant's Exhibit 28, is that a -- a Truxor document?

A Yeah.

Q And is it kept -- is it a document that was kept in the ordinary course of Truxor's business?

A Yes.

Q And are these business records that are routinely made or received in designing products such as the Truxor DM 5000?

A Yes.

MR. YACKEY: Objection, lacks foundation,

speculation.

Q (By Mr. Leach, continuing) And is Mr. Erik Nilsson the person that you would go to at Truxor to obtain records such as Defendant's Exhibit 28?

A Yes.

Q And did Mr. Erik Nilsson provide you with Truxor's business records showing the email between the supplier of the remote control unit --

A Yes.

Q -- for the --

Okay. And, again, that was for the Truxor DM 5000?

A Yes.

Q I've handed you -- or I'm going to hand you what's been marked as Defendant's Exhibit 29. Could you tell me what that document is?

A Yeah. This is the document from the supplier of the -- of the equipment that they say that they had get the radio now, it looks -- looking good. They will make some tests today and send it to -- to me tomorrow.

Q Okay. And you were aware that this project was going on at Truxor, right?

A Yeah.

Q Because you were responsible for the Truxor DM 5000, right?

A Yeah.

Q And so you understood they were working on making the Truxor DM 5000 remote control?
A Yes.
Q And, again --
MR. YACKEY: Sorry to interrupt. Can you confirm the Bates label for DX 29?
MR. LEACH: DX 29 is TRUX258.
THE WITNESS: Yes.
MR. YACKEY: Thank you.
Q (By Mr. Leach, continuing) And the email that Mr. Nilsson received was dated March 29, 2011; is that correct?
A Yes.
Q And is DX 29 a document prepared and kept in the ordinary course of Truxor's business?
A Yes.
Q And are emails with such suppliers business records that are routinely made or kept in the ordinary course of Truxor's business?
A Yes.
MR. YACKEY: Objection, lacks foundation, calls for speculation.
Q (By Mr. Leach, continuing) And is Mr. Nilsson, again, the person who would be responsible for keeping DX 29?
A Yes.

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Q And you asked Mr. Nilsson to provide this document to you and -- and you understand that he provided it from Truxor's files?
A Yes.
Q And is DX 29 a true and accurate copy of that email?
A Yes.
Q And, again, is -- back to DX 28. Is DX 28 a true and accurate copy of the email exchange between Mr. Svensson and Erik Nilsson?
A Yes.
Q And, again, this was -- and that included the attachment which was TRUX256 and 257, which was attached to that email?
A Yeah.
Q And it's your understanding that DX 28 is a true and accurate copy of that email and attachment?
A Yes.
Q And that was provided from the business records of Truxor?
A Yes.
Q You mentioned a video that you saw that was taken showing the Truxor DM 5000 being operated remote -- by remote control, correct?
A Yes.
Q I'm going to show that to you.

MR. LEACH: This is going to be 31.
(Deposition Exhibit 31 will be marked for identification.)
MR. YACKEY: Is this DX 31, Tom?
MR. LEACH: This is going to be DX 31. So DX 31 is TRUX259.3GP is what it says. I don't -- or 3GP, I think, is the file extension. It's TRUX259. And so --
MR. YACKEY: All right. Can you -- I apologize. Can you confirm for me what DX 30 was?
MR. LEACH: DX 30, I have not introduced that yet.
MR. YACKEY: Oh, okay.
MR. LEACH: Okay. Just a second. I'm writing on the marked exhibits, which we don't want to do.

Q (By Mr. Leach, continuing) Okay. So I'll provide DX 30. Mr. Olofsson, I'm handing you what's been marked as Defendant's Exhibit DX 30. Can you --

MR. LEACH: And, Scott, that's -- in the files you received, that's Dorotea Map Olofsson Depo --
MR. YACKEY: Okay.
MR. LEACH: -- Demon -- Demonstrative. That's the file. It should be a picture of a town and a lake and then it's a two-page document.

Q (By Mr. Leach, continuing) And so, Mr. Olofsson, can you

tell me really briefly what DX 30 is a picture of?
A Yeah, this is a picture of Dorotea. And we also see in the right corner below there is the Truxor Wetland Equipment. That's the factory.
Q And is that where you worked?
A Yeah, that's where I worked and the -- where the DM 5000 was produced.
Q Okay. And is that where you worked?
A Yes.
Q Okay. And so let's set that aside for a second. And -- and I'm going to show you a video, which is going to be marked as DX 31, and that's TRUX259.

(Video is playing.)

Q (By Mr. Leach, continuing) And so can you see that video?
A Yes.
Q We'll just watch it once and we can watch it again.

Okay. It's going to play again. I'd like to get the time stamps on this. So -- here, just a sec. I'm going to pause.

So can you generally tell me what is shown in the video, Defendant's Exhibit 31, which is TRUX251?
A Yeah, it shows DM 5000 that is driven -- driven on the -- on the Truxor Wetland Equipment's factory.
Q Is it driven in the parking lot?

A Yes.
Q And is the parking lot open to the public?
A Yeah, everyone can -- can go in.
Q Were you there when this was driven in the parking lot?
A I think I might have been looking at this. Maybe it could be me who is shooting the film, also.
Q Okay. Can you confirm for me, does the video -- when -- when you were watching this or videoing this, was the remote control able to control the tool linkage?
A Yeah. Yes, you can see. If --
MR. YACKEY: Objection, lacks foundation, calls for speculation.
A If you look carefully in the -- let's say when it's driving away from you, you can see the lift arm. This is, by the way, Erik Nilsson.
Q (By Mr. Leach, continuing) Okay. So let's just go back really quick. You said in the video at, let's see, time stamp --
A There (indicating).
Q Okay. At time stamp --
A 18.
Q -- 18 -- at 18 seconds in, it shows no one on the vehicle and the --
A Lift arm.
Q -- lift arm or lift linkage raising up.

A Yes.
Q Do you see that?
A Yes.
Q And I want to go back a little bit earlier. Who -- who do you see in the video, DX 31?
A Yeah, I saw the one we talk about, Erik Nilsson. There he is.
Q Okay. And so Erik Nilsson is shown at time stamp seven seconds into the video?
A Yes.
Q And is he the one using the remote control in there, if you can see?
A Yeah, you can see he's looking down to the remote control.
Q And was the remote control that was connected to the Truxor DX 5000 able to control the speed and direction of the vehicle on land?
A Yes. As you will see later, it increase the speed.
Q And that was about time stamp 22, 23 where it went from slower to faster; is that accurate?
A Yes.
Q And do you know who else is standing there?
A Yeah, that's some -- some guys that they work for.
Q For Truxor?
A Yes.

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Q And going back to the parking lot in Truxor, did the public sometimes come and go from the parking lot to pick up product, parts, that sort of thing?
A Yes, it --
MR. YACKEY: Objection, lacks foundation, calls for speculation.
A Yes, they -- they can drove there and -- because we also tour, private persons may -- may come and buy some steel or hydraulic components, and so --
Q (By Mr. Leach, continuing) So you sold parts to the general public --
A Yes.
Q -- around that time, too?
A Yes.
Q And so there was no confidentiality restrictions or -- or the parking lot wasn't closed down when the Truxor DM 5000 was being driven via remote control?
A No.
MR. YACKEY: Objection, lacks foundation, calls for speculation.
Q (By Mr. Leach, continuing) And you believe you were there, correct?
A Yeah.
Q And do you recall whether the parking lot was shut down or there was barriers put up so no one could enter while

this was happening?
A Never shut down.
Q Okay. And so the public could have come and gone to buy product from Truxor while you were using the Truxor DM 5000 with a remote control?
A Yes.
Q Okay. And do you recall, was the Truxor DM 5000 ever used off of Truxor's property?
A Yeah.
Q And tell me about that.
A Yeah, that -- we can see in this DX 30 picture on the -- maybe look at the next picture, you can see the Bergvattensj n, it's called. It's a lake in the city.
Q And can you spell that lake for the court reporter, please?
A B-e-r-g-v-a-t-t-e-n-s-j- -n.
Q And was the Truxor DM 5000 that had the remote control put on it driven in that lake shown in DX 30?
A Yes.
Q And -- and where was it driven?
A Yeah, you see the red ring, you see a little outgoing -- what you call it? The floating bridge.
Q Dock?
A Dock, yeah.
So we went out on that dock and then drove the

Truxor right forward and in the lake around the lake.
Q About -- did you go outside of the ring when you were driving the Truxor DM 5000 via remote control? Did you go outside the ring -- red ring shown in the picture?
A Yeah, the boat goes outside.
Q Yeah.
A Yeah, yeah, yeah, maybe a hundred meters from where we stand and drive.
Q Real quick going back to the video, Exhibit -- Defendant's Exhibit 31, TRUX251, was that a document kept in the ordinary course of Truxor's business?
A Yes.
Q Did Truxor normally videotape or -- or at times videotape product development-type activities?
A Yes.
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And do you believe you were the one taking the video in the parking lot?
A Yeah, it could be. I don't remember, but it could be me, yes.
Q Okay. But -- but you believe that -- that the video was kept in the ordinary course of Truxor's business?
A Yes.
Q And you reached --
MR. YACKEY: Objection, calls for speculation.

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Q (By Mr. Leach, continuing) And you reached out to Erik Nilsson who was responsible for keeping that business record of Truxor, right --
A Yeah.
Q -- the video?
And did Mr. Nilsson provide you the video?
A Yes.
Q Have you seen that video before?
A I don't remember, but I sure I have, but I don't remember.
Q Okay. And do you believe that -- that that video was a true and accurate copy of -- of -- of the video?
A Yeah, yeah, yeah.
MR. YACKEY: Objection, calls for speculation.
Q (By Mr. Leach, continuing) And so Mr. Nilsson would have been the person who maintained this record and had knowledge about the information contained therein?
A Yes.
MR. YACKEY: Objection, calls for speculation.
Q (By Mr. Leach, continuing) And he worked at Truxor?
A Yeah, he worked and work now.
Q He worked back then in 2011 --
A Yes.
Q -- and now?
A Yes.

Q And -- and you worked with Mr. Nilsson?
A Yes.
Q And you know him personally?
A Yeah, yeah.
Q And -- and that's how you know -- knew to reach out to him, because he was the type of person that would have such business records of Truxor?
A Yes.
Q And then you asked him for it and he provided it; is that correct?
A Yes.
Q And so going back to when the Truxor DM 5000 with the remote control was driven in the lake by town, can you tell me, was the vehicle able to drive on land and via the remote control where the speed and direction of the vehicle on land could be controlled?
A Yes, we drove it from -- from land down to water and out in the water.
Q And so then on the water when it was floating, was it able to -- were you able to control, via remote control, the speed and direction of the vehicle while it was floating?
A Yes.

MR. YACKEY: Objection, lacks foundation, calls for speculation.

Q (By Mr. Leach, continuing) Well, how do you know that?
A Yeah, because I -- at that time, I was there in the place and see it driven.
Q And you saw with your own eyes --
A Yeah, yeah.
Q -- the Truxor DM 5000 with remote control being driven into the lake via remote control and then the speed and direction controlled via remote control in the lake?
A Yes.
Q And do you know what year that was?
A It would be in the middle of 2011.
Q Okay. And is --
A It had to be the summertime, because it's water, not frozen.
Q Sure.

Tell me what buildings are around that dock where you're driving the Truxor DM 5000 via the remote control.

A You see a name a little bit up left from the ring -- red ring, it say Dorotea simning h l. It's a swimming -- swimming hole.
Q Is that a public building?
A Yes, a public building.
Q Okay.
A And then the right -- right to the left of ring there is

the school, so it's always school.
Q Do you recall -- when you were there watching the Truxor DM 5000 remote control version being driven around the land and in the water, do you remember people being out and about able to see it being used?
A Yes.
Q Were -- were people curious and -- and watching it?
A Yes, of course.
Q About how many people do you think were watching it? Do you recall?
A It's difficult --
MR. YACKEY: Objection, calls for speculation.
A -- difficult to say, but -- because the young people were out playing outside the school and then the -- the highway through Dorotea that say E45, the way -- the number of the way is the -- the general road through --
Q And so --
A -- Dorotea.
Q -- do you recall cars going by?
A Yes, yes.
Q And if a car was driving by on E45, would it be able to see the Truxor DM 5000 remote control --
A Yes.
Q -- version being used?
MR. YACKEY: Object --

A Yeah, no problem.
MR. YACKEY: -- calls for speculation.
A No problem for them. If they come with a car on the road, they see the whole lake, so --
Q (By Mr. Leach, continuing) It looks like there's a walking path. Is that a public walking path, too, along the lake?
A Yes, you can walk around the lake.
Q And do you recall when -- in 2011 when the Truxor DM 5000 with remote control was being driven in the lake, were there people walking around the lake?
MR. YACKEY: Objection, calls for speculation.
A I can't -- I can't say if -- if there was, but probably it could be, but I can't say.
Q (By Mr. Leach, continuing) Okay. And when you were using the Truxor DM 5000 remote control version in the lake in 2011, did you put restrictions on anyone that was around, like a nondisclosure agreement, or -- or tell them they had to keep it secret?
A No, no.
Q Was this intended to be a public use of the vehicle in 2011?
MR. YACKEY: Objection, vague --
A Yeah.
MR. YACKEY: -- calls for speculation.

A Yeah, the proto -- if you drive a prototype, it was no secret, we go on.
Q (By Mr. Leach, continuing) Okay. You -- you -- you don't recall when that was happening in 2011 that you did anything to try to keep it secret?
A No, no.
Q And you do recall people being out and cars on -- on the road while it was being driven on land and water?
A Yes.
Q Do you recall whether it had any attachments on it?
MR. YACKEY: Objection, calls for speculation.
A I don't think any tools was on it.
Q (By Mr. Leach, continuing) Okay.
A It's -- I think it was like we see in the movie.
Q But at the time, that Truxor DM 5000 was, aside from the remote control, the same as the -- the commercially sold version?
A Yes.
Q And so a tool could have been put on it?
A Yes.
Q In looking at DX 30, is -- is this a true and accurate depiction of the town, like a satellite map or image of the town Dorotea and Truxor Wetland Equipment AB?
A Yes.
Q And then the next -- Page 2 of DX 30, is that a --

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A That's a zoomed-in picture.
Q -- a zoomed-in picture of that?
A Yes.
Q And is that a true and accurate representation of -- of what that town and the lake looked like?
A Yes.
Q And is it still an accurate depiction today of what it looked like in 2011?
A Yes.
Q Was this dock that was there, is that a public dock?
A Yes.
Q Did people swim off it or fish off it?
A They have fish, so they stood there and fishing maybe sometimes.
Q Okay. How long have you lived in -- well, where do you live? Do you live in Dorotea?
A Yes, I live in Dorotea.
Q And -- and how long have you lived there?
A I live there for, let's say, 40 years maybe.
Q So you know the town well?
A Yeah, yeah.
Q When Truxor was -- or when the Truxor DM 5000 remote control version was being used in the lake in -- in 2011, would -- would people in the -- you said the school -- young adults were out, would they be able to

see it from the school?
A Yes.
MR. YACKEY: Objection, calls for speculation, lack of foundation.
Q (By Mr. Leach, continuing) Is there anything obstructing their view like trees or bushes or anything like that or other buildings?
A No, no.
Q And -- and to be clear, did the remote control -- when it was being used at the lake in 2011, did the remote control control the speed and direction of the vehicle when on land?
A Yes.
Q Did the remote control control the speed and direction of the vehicle while floating?
A Yes.
Q Could the operator remotely control the Doro pump or other tools if they were attached via the remote control?
A Yes.
Q Did you personally observe the operator remotely drive and steer the Truxor DM 5000 to the bank of the lake and into the water?
A Yes.
Q Do you recall who was driving it?

A I think it was Erik Nilsson then.
Q Okay. Did you see the operator remotely control the speed and direction of the Truxor DM 5000 in the lake?
A Yes.
Q Could he steer the vehicle while floating?
A Yes.
Q And can you tell me how he was able to steer the vehicle while floating with the remote control?
A Yeah, they have paddles - small paddles. They drive each band with the paddles, so they could turn it backwards and turn around and --
Q And so when you say the bands, are you talking about the tracks?
A The tracks, yes.
Q Okay. And so he could put both tracks moving forward with the remote control and it would go forward. If he had one track going forward and one track going in reverse, it would spin around?
A Yes.
Q And you personally saw that happen?
A Yeah.
Q Did you have any other Truxor vehicles there?
A In that moment?
Q Yeah.
A I think we have another DM 5000 there also, because we

not sure how long distance this remote control can handle. So if lose control, we might go by it with the other and pick it up.

Q Okay. Did -- did -- did you have to do that with the other one?

A No.

Q And so did the Truxor DM 5000 with the remote control work for its intended purpose?

A Yes.

MR. YACKEY: Objection, vague.

Q (By Mr. Leach, continuing) And -- and do you know, was Mr. Nilsson, in -- in 2011 at the lake where the -- the lake next to Dorotea where the Truxor DM 5000 remote control was being used, were they using the remote control structure or product that was shown in Defendant's Exhibit 28 on TRUX256?

A Yes.

MR. YACKEY: Objection, lacks foundation.

Q (By Mr. Leach, continuing) How do you know that?

A Yeah, because that's what -- the only unit that we -- we tried on Truxor to make it --

Q Did you see --

A -- remote.

Q -- Mr. Nilsson actually using that unit to drive the --

A Yes.

Q -- Truxor DM 5000?
A Yes. And if you look at the video, also you can see that -- you can't see all the unit, but you can see that he held the unit and look down to it.
Q Okay. Okay.

(Deposition Exhibit 32 was marked for identification.)

Q (By Mr. Leach, continuing) Mr. Olofsson, I'm handing you what's been marked as Defendant's Exhibit 32. And Defendant's Exhibit 32 is Bates numbered BAZ15_0001096 through BAZ_0001247.

Sir, could you please take a look at this and tell me what that document is?

A Yeah, this is the document that I -- I put my signature on in 27 February last year, 2023.
Q And I just want to go through this. Can -- can you read the -- the beginning of it up through Paragraph 2?
A From -- I'll start with 1?
Q Yep.
A Yeah.
Q Or start with who made the declaration.
A Okay. I, Reidar Olofsson, do hereby declare as follows: I am the mechanical engineer of Truxor Wetland Equipment (Truxor) formerly known as Dorotea Mekaniska AB. I have been employed by Truxor since '94 1st August. I am not

being compensated for my testimony or involvement in this matter. I have no financial -- financial interest in the outcome of this proceeding.

Q And is that accurate today?

A Yeah.

Q Now you -- you flew here from Sweden on Sunday, was it, or Monday?

A Monday.

Q Monday. And who is covering the cost of your flights?

A Yeah, that's you, Merchant Gould.

Q Yeah, or our -- our client Bazooka?

A Or your client, okay.

Q Okay. And so -- so you are -- you are receiving a flight here, but are you being compensated for your time?

A No, just for the expenses when I stay here.

Q Your -- your expenses?

A Yes.

Q And, also, you'll be flying to California to visit a nephew --

A Yeah.

Q -- tomorrow, correct?

A Tomorrow, yeah.

Q And -- and then going back to Sweden, correct?

A Yes.

Q And we agreed to -- or the client agreed to cover the cost of your flight to California and then back to Sweden, as well, correct?
A Yeah.
Q Okay.
MR. YACKEY: Objection, leading.
Q (By Mr. Leach, continuing) So going to Paragraph 3, can you read Paragraph 3?
A Okay. Prior to August 19, 2013, the purpose of Truxor's marketing materials and brochures was to generate public interest in its products. Prior to August 19, 2013, it was Truxor's standard business practice to make its marketing materials and brochures publicly accessible, for example by posting them on its website under the Brochures tab and by distributing them to potential customers. See Exhibit A at 6 (providing links to download Truxor's product brochures under the Brochures tab of Truxor's website).
Q Yes or no, is Paragraph 3 true and accurate?
A Yes, it is.
Q Can you look at -- well, let's -- let's go to Exhibit A at 6. What is shown at Page 6 of Exhibit A, which is BAZ_0001107.
A Okay. This is the website from Dorotea Mekaniska it's called at that time.

Q Okay. And then if you turn further to BAZ15_0001112 -- just keep turning the page. Yep. Can you tell me what the document is, BAZ15_0001112 through BAZ15_0001127? What is that document?
A Yeah, this is a brochure of, as it say, Truxor amphibian tool carrier in the English language. And as you see, you have also the Truxor 5000 and Truxor 4700, and also the tools that you can connect to these two machines.
Q Was this document publicly available on Truxor's website prior to 2013?
A Yes.
Q And does this document accurately reflect the information about the Truxor DM 5000 and DM 4700?
A Yes.
Q And does it also accurately -- accurately reflect the information about the various tools for those products?
A Yes.
Q Are brochures such as the Truxor brochure we're talking about, BAZ15_0001112 to BAZ15_0001127, documents that are routinely made for marketing the Truxor products?
A Yes.
Q And is that a document that's kept in the ordinary course of Truxor's business?
A Yes.
Q And is this a document that Truxor would make available

on its website for the public to download?
A Yes.
Q Were you involved in providing information for the creation of this document?
A Yes.
Q And what type of information would you have provided for the creation of this document?
A About the most specification of technical data.
Q Would you have reviewed this document to make sure it's accurate before it was publicly released?
A Yes.
Q And is this a true and accurate copy of Truxor's UK brochure for the Truxor amphibian tool carrier?
A Yes.
Q Going back to your declaration, can you read Paragraph 4?
A 4, yes. Truxor's -- Truxor's website (https://doroteamekaniska.se/) was indexed and searchable by a commercial Internet search engine prior to August 19, 2013. For example, searching Dorotea Mekaniska on Google using a custom date range of "before 19 of August 2013" or "before 18 August 2010" returns search results for Dorotea Mekaniska's website.
Q Is that a true and accurate statement?
A Yes.

Q Can you read Paragraph 5?
A Truxor's DM 5000 and DM 4700 amphibious vehicle products and their associated dredging capabilities were the subject of news publications prior to August 19, 2013. See Exhibit C, accessible at https:// -- and I don't know. This is Polish, so --
Q The -- the rest of the -- the --
A The website.
Q Yeah.
A Yeah. I go on from after that, yep.

Truxor appreciated being published in news publications because they helped to stir attention for Truxor's products and increased Internet traffic to Truxor's website, where its marketing materials describing its products were accessible to website visitors.

Q Is that a true statement?
A Yes.
Q Can you turn to Paragraph 6 and please read that?
A Prior to August 19, 2013, it was Truxor's standard business practice to direct members of the public who were interested in learning more about its products to its website (https://doroteamekaniska/se).
Q Is that an accurate statement?
A Yes.

Q Can you read Paragraph 7, please?
A Prior to August 19, 2013, it was Truxor's standard business practice to provide its marketing materials and brochures, such as Exhibit D, E, F, and G to members of the public who were interested in buying or learning more about its products.
Q Is that an accurate statement?
A Yes.
Q And can you quickly turn to Exhibits D, E, F, and G? And let's start with Exhibit D. And that's BAZ15_0001138 to BAZ15_0001153.

Do you see that?

A Yeah.
Q And is that, again, a copy of the UK version of Truxor's amphibious tool carrier brochure?
A Yes.
Q And does this accurately reflect the Truxor DM 5000 and its associated tools?
A Yes.
Q And does that include the Doro pump?
A Yes.
Q And is the Doro pump shown on BAZ15_0001147?
A Yes.
Q And is the information contained in the UK version of the Truxor amphibian tool carrier brochure true and

accurate?
A Yes, it is.
Q And this was publicly available prior to 2013?
A Yes.
Q If you turn to Exhibit E -- well, let me back up. On -- on Exhibit D of your declaration, the UK version of the Truxor brochure, this was a document kept in the ordinary course of Truxor's business, correct?
A Yes.
Q And this was made available to the public via the Internet prior to 2013?
A Yes.
Q Okay. Let's turn to Exhibit E to the declaration of Reidar Olofsson. And Exhibit E is BAZ15_0001155 through BAZ15_0001174, correct?
A Yes.
Q Is -- is this -- what is this document?
A Yeah, this is the brochure for the -- one of our American retailer, as it's shown in the last page, retailer FloridAquatic in Florida.
Q And was this document publicly available prior to August of 2013?
A Yes.
Q And is this a true and accurate copy of the Truxor U.S. brochure?

A Yes.
Q And if you can look at Exhibit G -- or I'm sorry, Exhibit F and G, does the same hold true for those two brochures, as well?
A Yeah, but it is a different retailer.
Q For --
A For F.
Q -- Exhibit F?
A Hockney Underwater Weed in Wisconsin, I think.
Q Okay. And you're looking at BAZ_0001195?
A Yes.
Q And are all these brochures/documents kept in the ordinary course of Truxor's business?
A Yes.
Q And are these documents maintained in the ordinary course of Truxor's business?
A Yes.
Q And are these documents true and accurate copies of Truxor's brochures?
A Yes.
Q And were these documents all publicly available prior to August of 2013?
A Yes.
Q Let's go to Paragraph 8 of your declaration. Can you read that, please?

A Prior to August 19, 2013, it was Truxor's standard business practice to provide -- provide updated instruction manuals and assembly diagrams describing its products, such as Exhibit H and I to consumers who purchased or were interested in purchasing or learning more its products.

Q Is that true and accurate?

A Yes.

Q Can you look at Paragraph 9?

A Exhibit D is a true and correct copy of Truxor's Truxor amphibian tool carrier brochure.

Q Is that true and accurate?

A Yeah.

Q Can you read Paragraph 10?

A Exhibit D was -- was freely available for download on Truxor's website at least as early as August 18, 2010.

Q Is that true and accurate?

A Yes.

Q Can you read Paragraph 11?

A Exhibit D truthfully and accurately portrays and describes the characteristics and functionality of the DM 4700 and the DM 5000 amphibious vehicles.

Q Is that true and accurate?

A Yes.

Q Can you read Paragraph 12, please?

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A In addition, Exhibit D truthful and accurately portrays and describes the characteristics and functionality of the Doro pump, a dredging pump accessory that is used on the DM 5000 vehicles.
Q Is that true and accurate?
A Yes.
Q Can you read Paragraph 13, please, for me?
A Exhibit E and Exhibit F are a true and correct copies of Truxor's Truxor amphibian tool carrier brochure.
Q Is that true and accurate?
A Yes.
Q Can you read Exhibit 14 -- I'm sorry. Can you read Paragraph 14?
A As shown below, Truxor created Exhibit E and F on April 26, 2013, as reflected in the screenshot of Truxor's business records, detailing the create date of these documents (Exhibit E file name: Truxor 2013 U.S. inch FloridAquatic, John Farell; Exhibit F file name: Truxor 2013 U.S. inch Hockney).
Q Is that true and accurate?
A Yes.
Q And did you confirm that these were create dates of these documents?
A Yes.
Q Can you please read Exhibit -- or I'm sorry,

Paragraph 15?

A Exhibit E and F each truthfully and accurately portrays and describes the characteristics and functionality of the DM 4700 and the DM 5000 amphibious vehicles.

Q Can you read -- I'm sorry. Is that true and accurate?

A Yes.

Q Can you please read Paragraph 16?

A In addition, Exhibit -- Exhibit E and F each truthfully and accurately portrays and describes the characteristics and functionality of the Doro pump, a dredging pump accessory that is used on the DM 5000 vehicle.

Q And is that true and accurate?

A Yes.

Q So the Doro pump was a dredging pump accessory that is used on the DM 5000 vehicle?

A Yes.

Q Okay. Can you please read Paragraph 17?

A Truxor provide Exhibit E and F to the public, including its various retailers. The screenshot of Truxor's business records, provided above, details the recipient -- recipient of each marketing brochure. As shown in the screenshot, Exhibit E was provided to Truxor's U.S. retailer FloridAquatic. See also Exhibit E at 20 (listing retailer FloridAquatic).

Q And when it says "Exhibit E at 20", if you go to Exhibit E, it's Page 20 of the actual brochure, right, which is found on BAZ15_0001174, correct?
A Yes.
Q Okay. Keep going.
A As shown in the screenshot, Exhibit F was provided to Truxor's U.S. retailer, Hockney Underwater Weed Cutters, Incorporated. See also Exhibit F at 20 (listing retailer Hockney Underwater Weed Cutters, Inc.).
Q And is that true and accurate?
A Yes.
Q Can you read Paragraph 18?
A Exhibit G is a true and correct copy of Truxor's Truxor amphibian tool carrier brochure.
Q And I think you said Exhibit G, correct? I heard you right?
A Exhibit G.
Q Yes. Okay. And is that true and accurate?
A Yes.
Q Can you please read Paragraph 19?
A Exhibit G was posted online on a website belonging to Aquaclear Water Management, one of Truxor's UK distributors. The URL posting includes Exhibit G (https://www.aquaclearwatermanagement.com/docs/truxor_2012_ENG.pdf) was indexed and searchable by a commercial

Internet search engine prior to August 19, 2013. For example, searching "amphibious and machine and pump" on Google using a custom date range before 8 -- 19 August 2013" returns a search result for the URL that includes Exhibit G. See Exhibit J.

Q Is that true and accurate?

A Yes.

Q Can you read Paragraph 20, please?

A As noted in 1, the date listed on the Google search page next to the link for Exhibit G and, 2, the URL address were Exhibit G is available, Truxor created Exhibit G at least as early as 2012. Exhibit J.

Q Is Paragraph 20 true and accurate?

A Yes.

Q Can you read Paragraph 21, please?

A Exhibit G truthfully and accurately portrays and describes the characteristics and functionality of the DM 4700 and the DM 5000 amphibious vehicles.

Q Is that true and accurate?

A Yes.

Q Can you please read Paragraph 22?

A In addition, Exhibit G truthfully and accurately portrays and describes the characteristics and functionality of the Doro pump, a dredge pump accessory that is used on the DM 5000 vehicle.

Q Is that true and accurate?
A Yes.
Q Can you read the next paragraph, 23?
A Exhibit H has -- is a true and correct copy of Truxor's Doro pump instruction manual.
Q Is that true and accurate?
A Yes.
Q Can you read Paragraph 24, please?
A As noted in the upper left-hand corner of the document, Truxor create Exhibit H on January 27, 2013.
Q Is that true and accurate?
A Yes.
Q Can you read Paragraph 25, please?
A Exhibit H truthfully and accurately portrays and describes the characteristics and functionality of the Doro pump, as used on the DM 5000 vehicle.
Q Is that true and accurate?
A Yes.
Q Can you please read Paragraph 26? Only a few more to go.
A Okay. Exhibit I is a true and correct copy of Truxor's Doro pump assembly diagram.
Q Is that true and accurate?
A Yes.
Q Can you read Paragraph 27, please?

A As noted in the upper left-hand corner of the document, Truxor create Exhibit I on September 21, 2010.
Q Is that true and accurate?
A Yes.
Q Can you please read Paragraph 28?
A Exhibit I truthfully and accurately portrays and describes the components and assembly of Doro pump, or dredge pump, as used on the DM 5000 vehicle.
Q Is that true and accurate?
A Yes.
Q Can you read Paragraph 29?
A Prior to August 19, 2013, Truxor modified, retrofitted, and sold LJ 1003 slurry pumps, manufactured by Mamec Oy, for use on its Truxor DM 4700 vehicle. Exhibit K is an engineering drawing and parts list of the LG 1003, dated 3rd January 2006, pulled from Truxor's business records.
Q Was that true and accurate?
A Yes.
MR. YACKEY: Objection, foundation.
Q (By Mr. Leach, continuing) Did you modify the LJ 1003 slurry pump?
A Yeah, we bought part of the com -- their complete pump.
Q Okay. And the parts list for that pump, the LJ 1003 that was dated January 3rd, 2006, was that a document that you received from them?

A Yes.
Q And -- and was it received in the normal course of Truxor's business in -- in designing or -- or obtaining products for its products?
A Yeah, it's -- it was a, what you say, almost a spare part list for this product, yes.
Q And did you keep that document in Truxor's business records?
A Yes.
Q And did you rely on that document as a true and accurate representation of that pump?
A Yes.
Q And did you have a chance to look at that document and look at the pump and -- and confirm that those -- that that document accurately reflected the pump?
A Yes.
Q And that document was pulled, as it says there, from Truxor's business records?
A Yes.
Q And you certified that this declaration was true and accurate, right?
Can you just read Paragraph 30 for me?
A I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and that

these statements were made with knowledge that will -- willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Paragraph 1001.

Q Okay. And is that your signature on the bottom --

A Yes.

Q -- of Defendant's Exhibit 32 --

A Yes.

Q -- on Page 5?

A Yes, it is.

Q And that the name is Reidar Olofsson? That's you?

A Yeah, that's me.

Q And did you sign this in -- on February 27th, 2023?

A Yes.

Q And do you agree with all the information contained therein?

A Yes.

Q Okay. Should we take a break?

A Yes. Maybe short.

MR. LEACH: A five-minute break, guys?

MR. YACKEY: That works.

VIDEOGRAPHER: The time is approximately 1:54 p.m. and we're going off the record.

(A recess was taken.)

VIDEOGRAPHER: We're back on the record. The

time is approximately 2:02 p.m.

Q (By Mr. Leach, continuing) Good afternoon, Mr. Olofsson. Thanks again for your time here.

I want to go through and -- and talk about some of the features that the Truxor DM 5000 had and its structure prior to August of 2013, okay? So I want to focus on what the vehicle structure was and some of its tools were and how they operated prior to August of 2013, okay?

A Okay.

Q Was the Truxor DM 5000 an amphibious vehicle?

A Yes, it was.

Q Did it have a floatable vehicle body?

A Yes, it have --

MR. YACKEY: Objection, vague, lacks foundation.

A They have two pontoons.

Q (By Mr. Leach, continuing) Did it have ground-engaging propulsion structure comprising a plurality of ground-engaging elements powered by a hydraulic motor?

A Yeah, they have --

MR. YACKEY: Objection, vague, lacks foundation.

A -- drive band that was driven by hydraulic motors.

Q (By Mr. Leach, continuing) Okay. And you said it had

two drive belts that were driven by hydraulic motors.

Are the drive belts like or equal to tracks?

A Yes, you can say.

Q And for at least one of the tools that was sold with the Truxor DM 5000, it was a -- fluid pump that could pump liquid manure, right?

MR. YACKEY: Objection, leading, calls for speculation, vague.

A Yeah, we -- we make a dredge pump. We call it a dredge pump.

Q (By Mr. Leach, continuing) Okay. So let me rephrase that.

Did the Truxor DM 5000 with a Doro pump, was that a fluid pump for pumping liquid with suspended solids?

A Yes.

MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.

Q (By Mr. Leach, continuing) Would the Doro pump be capable of pumping liquid manure?

A Yes, no problem.

MR. YACKEY: Objection, calls for speculation.

Q (By Mr. Leach, continuing) Would the Doro pump be capable of pumping a slurry?

A Yes.

MR. YACKEY: Objection, calls for speculation.

Q (By Mr. Leach, continuing) Did the Doro -- I'm sorry. Did the Truxor DM 5000 that was publicly used, offered for sale, sold prior to August 2013 include a power source connected to a hydraulic pump, the power source configured to provide power to both the ground-engaging propulsion structure and the fluid pump?
A Yes.
Q And I think we talked about the -- a version of the Truxor DM 5000 that was publicly used in 2011 that included remote control, right?
A Yes.
Q I want to ask, did it include this element -- or -- or did it include this feature: A wireless remote control configured to enable an operator, who was remote from the vehicle, to control the ground-engaging propulsion structure, control a flow of liquid manure or a flow of fluid from the fluid pump, control at least one of the speed and direction the vehicle when the vehicle is ground-engaging, and control at least one of the speed and direction of the vehicle when the vehicle is floating?
A Yes.
MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) Did the Truxor DM 5000, was

that a vehicle that included a conduit fluidly connected to the fluid pump?

A Yes.

Q Did the conduit include an opening at the end thereof?

A Yes.

Q If there was a conduit and a nozzle on the Truxor 5000, in the remote control version if you remotely turn the orientation of the vehicle, would that also change the orientation of the opening of the -- the conduit or nozzle?

A Yes.

MR. YACKEY: Objection, calls for speculation, assumes facts not in evidence.

Q (By Mr. Leach, continuing) Did the Truxor DM 5000 include a nozzle at the end of the conduit?

A Yes.

MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.

Q (By Mr. Leach, continuing) And -- and what was the nozzle used for?

MR. YACKEY: Objection, calls for speculation.

A Yeah, instead of maybe you pull out a hose up on the land, you can spray the -- what you -- what you dredge up up on -- on the land.

Q (By Mr. Leach, continuing) Was the nozzle a -- a short

tapered tube that speed up the flow of fluid through it?
A Yes.
MR. YACKEY: Objection, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) And did you -- did you design the nozzle for the Truxor DM 5000?
A Yes.
Q And so do you know whether it had a constriction --
A Yes.
Q -- to speed up the flow of fluid?
A Yes, it had, yeah.
Q Is that what the -- the -- a nozzle is, a -- a structure that has a constriction or a taper to it that speeds up the flow --
MR. YACKEY: Objection --
Q (By Mr. Leach, continuing) -- of fluid?
A Yes.
THE COURT REPORTER: Did you have an objection?
MR. YACKEY: Yeah, I -- I thought Tom was done asking his question. But sorry, Tom, I'll let you finish.
MR. LEACH: I think I was done.
MR. YACKEY: All right. Objection, vague, calls for speculation.

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Q (By Mr. Leach, continuing) Mr. Olofsson, the Truxor DM 5000 that was sold, offered for sale, and publicly used prior to 2013, with the Doro pump and the nozzle on it, could you use the nozzle -- the force of the nozzle to change the speed or direction of the vehicle when the vehicle was floating?

A Yes, it does.

MR. YACKEY: Objection, calls for speculation.

Q (By Mr. Leach, continuing) And -- and what causes that to happen? If you have the pump conduit and nozzle having a force of fluid coming out of it, what does that do?

A Yew, the power of the water is coming up, it, what you say, pushes the -- the Truxor in the opposite direction.

Q In the Truxor DM 5000 that was sold, offered for sale, and publicly used prior to 2013, did that vehicle include a power source that was connected to the hydraulic pump by a mechanical drive?

A Yes.

Q And -- and can you describe what that was? Was it a shaft -- a mechanical shaft? Or what -- how was it mechanically connected?

A Yeah, between the hydraulic motor.

Q Between the motor, the diesel engine, and the hydraulic pump?

A Okay. So it's a mechanical connection between these.
Q And for the Doro pump, was there a mechanical connection between the hydraulic motor and the pump?
A Yes, it was.
Q So would you agree with me that between the hydraulic motor and the fluid pump, there was a mechanical drive?
A Yes.
Q And what was that mechanical drive?
A It was a shaft between the motor and the -- what you say, the impeller.
Q The Truxor DM 5000 included tracks, correct?
A Yes.
Q On each side of the track, there was a drive wheel, correct?
A Yeah.
Q What was connected to one of the drive wheels?
A At first you have the hydraulic motor and a roll chain down to the drive wheel.
Q And was that on each side of the vehicle?
A In the -- in the end of both pontoons.
Q Okay. So one on each side at the end of the pontoon?
A Yes.
Q And so that was a hydraulic motor with a sprocket connected to a -- another drive wheel via a chain?
A Yes.

Q And that's what powered the vehicle?
A Yes.
Q And could those hydraulic motors operate at variable speeds?
A Yes.
Q And could they operate in different directions?
A Yes.
Q And when you operated them in different direction, what happened?
A It goes backward or forward or you can spin around.
Q Okay. So when you're operating the hydraulic motors in different directions on the -- for the drive wheels, what would happen?
A Yeah, different direction it spins around its own axis.
Q Okay. For the version that included remote control, could the remote control operate the hydraulic motor to operate the ground-engaging propulsion structure at variable speeds?
A Yes.
Q Did the tracks include a set of drive wheels?
A Yes, in the front and the back of the pontoon.
Q And the drive wheels drove the tracks?
A Yes.
Q Were the wheels -- the drive wheels on the tracks operable at variable speeds by the hydraulic motors?

A Yes.
Q Did the Truxor DM 5000 that was sold, offered for sale, and publicly used prior to 2013 include a power source configured to provide power to move the vehicle both when the vehicle is ground-engaging and when the vehicle is floating in a fluid?
A Yes.
Q Would the Truxor DM 5000 be operable in a liquid manure lagoon?
A Yes.
MR. YACKEY: Objection, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) And specifically would the Truxor DM 5000 with the Doro pump attached and the nozzle be able to operate in a manure lagoon and spray liquid manure into the air?
A Yes.
MR. YACKEY: Objection, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) If the Doro pump -- strike that.
Would the remote control version of the Truxor DM 5000 with the Doro pump tool on it and a nozzle be able to drive remotely -- remote control drive into a manure lagoon, operate the pump to spray liquid manure

into the air or -- and then drive out of the liquid manure lagoon?

A Yes.

MR. YACKEY: Objection, vague, calls for speculation, lacks foundation, assumes facts not in evidence.

Q (By Mr. Leach, continuing) And would you be able to control the speed and direction of the vehicle on ground via remote control?

A Yes.

Q And would you have been able to control the speed and direction of the vehicle while it's floating in a liquid manure lagoon via remote control?

A Yes.

MR. YACKEY: Objection, calls for speculation.

Q (By Mr. Leach, continuing) And could you turn the Doro pump on and off via remote control?

A Yes.

MR. YACKEY: Objection, calls for speculation, lacks foundation, assumes facts not in evidence.

Q (By Mr. Leach, continuing) Did the Doro pump tool that was used on the Truxor DM 5000 include an impeller?

A Yes, if you call it impeller or -- yeah, or a pump wheel or what you call it, yeah.

Q Your terminology in -- in Swedish lingo would be a pump

wheel?
A Pump wheel, yeah.
Q And is that the structure that spins inside the housing --
A Yes.
Q -- to cause the flow of fluid through the pump?
A Yeah, the centrifugal.
Q In a centrifugal pump?
A Yes.
Q Okay. Did the Doro pump have a bottom fluid inlet configured to be immersed in liquid when the vehicle was floating?
A Yes.
Q And can you explain how that would -- how that would work?
A Yeah. You have the intank -- intake in the bottom of this housing. And then you have -- inside the housing, you have the impeller that you call that sucks in this liquid in the pump and then throw it outside and out in the out --
Q And so when the Truxor DM 5000 with a Doro pump on it was floating in a fluid, the -- the pump could be placed under the water or under the -- any fluid, correct?
A Yes.
Q And would that be true if the fluid was pond water or

sediment or liquid manure in a manure lagoon?
A It works the same.
MR. YACKEY: Objection, vague, calls for speculation, lack of foundation.
Q (By Mr. Leach, continuing) Did the Truxor DM 5000 have a variable speed hydraulic motor per side or per track?
A Yes.
Q Could you change the direction of the drive wheels on each track?
A Yes.
Q And explain what would happen when you changed the direction of the drive wheels on each track.
A If you -- if you reverse the drive wheels, then the band also goes reverse.
Q Okay. And the drive wheels, there were four of them, one on each side of the pontoon or each end of the pontoons?
A Each end of the pontoon. The drive wheels is one end and all just ordinary wheels in the other end.
Q A free-spinning wheel on the other end?
A Free-spinning wheel, yes.
Q Okay. Were the pontoon elements buoyant elements?
A Yes.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) Were the pontoon elements

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between the drive wheels on each pontoon?
A Yes.
Q And so would the Truxor -- I'm sorry. Did the Truxor DM 5000 have floatable -- I'm sorry, have buoyant elements between the two drive wheels on the vehicle?
A Not between the two drive wheels, but between the drive wheels and the free wheels on the same pontoon.
Q I see. So you had a powered wheel and a non-powered wheel --
A Yes.
Q -- that drove the track?
A Yeah.
Q And the buoyant elements were between the -- the drive wheel and the free-spinning wheel?
A Yes.
Q Did the Truxor DM 5000 have a center of gravity located along a longitudinal center line of the vehicle substantially in the middle of the vehicle?
A Yes.
Q And -- and how do you know that?
MR. YACKEY: Objection, calls for speculation, lacks foundation.
A It was crucial that it was in the same level as it don't lean at either side. Because when -- if it was a little bit heavier on the right side, then when you drive on

the water, the boat will turn right.

So you have to -- when you make the Truxor construction, you have -- maybe we have to move the engine with the hydraulic pump maybe a little bit to the left to make it float even in the water.

Q And so did you specifically design the Truxor such that the center of gravity was located along a center -- longitudinal center line of the vehicle substantially in the middle of the vehicle?

A Yes.

Q And --

MR. YACKEY: Objection, lacks foundation, assumes facts not in evidence.

Q (By Mr. Leach, continuing) -- did you design the Truxor to be able to adjust the center of gravity of the vehicle by moving anything?

A Yes. This is --

Q And explain that, please.

A This is a benefit of the whole Truxor that is -- we have the -- what you say, the lower part, what you say, with the pontoons, the bands, and the -- the frames.

And then on the top, we have the -- what we call the sledge. It's the part of where the driver seat is and the engine and the hydraulic pumps and the hydraulic tank and a fuel tank.

And all this upper body, the sledge, you can, with hydraulic, move forward and backwards on the whole -- whole Truxor.

Q And why would you want to be able to move all those components forwards and backwards?

A It depends on -- in the front, we have the lift arm. And depending on what tools or even when you collect the cut -- what you have cut, the weeds, it float to the surface -- water surface. Then when they go over the -- the rake to collect them, it's buildup the -- very much weight. And if we don't -- cannot move this sledge backward, it will go floating with its nose down. So you have to back the sledge to get the rake up from the water.

Q So is it correct that you designed the Truxor so you could have a desired location in the center of gravity?

A Yes. We call it the weight distribution.

MR. YACKEY: Hey, Tom?

MR. LEACH: Yes?

MR. YACKEY: I think at this point we've gone past the three-and-a-half hours.

MR. LEACH: I've got -- I've got a little more to go. Scott, you're not going to -- you're not going to cut our time in half with this witness. That's just not going to happen.

MR. YACKEY: Oh. We were under the impression from -- from communications with Taylor that we'd be splitting time on these depositions, so --

MR. LEACH: No. I -- You're mistaken.

MR. KELLA: Tom, if you want to use this depo, you've got to be prepared to split it.

MR. LEACH: Hey, Mike? You shouldn't even being speaking on this depo given that this is -- the one on the other side, on your side, is Scott, Mr. Yackey. So I'm going to keep going, guys. So don't want waste time, 'cause you're --

MR. KELLA: I'm speaking on behalf of Nuhn.

MR. LEACH: You're -- you're wasting your time.

MR. KELLA: Nuhn, excuse me. It's 30 seconds. You just -- so Nuhn's -- you know Nuhn's objection, then, to Bazooka using this depo if it's not going to allow for appropriate cross-examination for the witness who is Bazooka's client, who's your client.

MR. LEACH: Mike, you shouldn't be speaking. You're not -- you're not part of this deposition, sir, so --

MR. KELLA: You know, it's inappropriate. So that's fine. It's your -- it's your decision.

Q (By Mr. Leach, continuing) Mr. Olofsson, sorry about

the -- the interruption. I'm going to keep going here.

Again, we're talking about the structure and functionality of the Truxor DM 5000 that was sold, publicly used, and -- and offered for sale prior to August of 2013.

Did the Truxor DM 5000 have a ground-engaging propulsion structure that included a first front drive wheel, a second front wheel, a first rear wheel, and a second rear wheel wherein the first front wheel and the first rear wheel are on the first side of the vehicle, and a second front wheel and a second rear wheel are on the second side of the vehicle?

A Yes.

Q And those are the wheels that the tracks ran on, right?

A Yes.

Q And so there were two wheels per track, one on each end of the tracks?

A End and the front, yes.

Q Okay. And one of those wheels on each side of the pontoon in in back was driven by a variable speed hydraulic motor --

A Yes.

Q -- correct?

And did the Truxor DM 5000 have a floatable vehicle body comprising a first buoyant element situated between

the first front wheel and the first rear wheel and a second buoyant element between the second front wheel and the second rear wheel?

A Yes.

MR. YACKEY: Objection, vague, lacks foundation.

Q (By Mr. Leach, continuing) And, again, we're talking about the wheels that drove or -- or facilitated the track moving around, right?

A Yes.

Q And those two wheels were on each side of the vehicle on the pontoons, right, or the pon -- I'm sorry.

A Each end of the vehicle.

Q -- at each end of the vehicle. And -- and the buoyant elements or the pontoons were between them, right?

A Yes.

MR. YACKEY: Objection, leading.

Q (By Mr. Leach, continuing) Well, explain where the pon -- sir, if you could, please explain where the pontoons were relative to the wheels that facilitated movement of the tracks?

A Yeah, the pontoon approximately is four meter long. And in the front you have the -- what you call the free wheels and in the back you have the drive wheels. That was connected to the hydraulic motors. And then around

these wheels and around this pontoon, there's a drive belt goes and drive the whole machine forward and backwards.

Q And where was the buoyant elements located with respect to the two wheels on each side of the pontoons -- or on each side of the vehicle?

A Yeah, it's between -- between these wheels, all the way between.

Q And the Truxor DM 5000 with the Doro pump included a rotating shaft that was configured to move a fluid?

A Yes.

Q And if that boat -- I'm sorry. If the amphibious vehicle, the Truxor DM 5000, was placed in a liquid manure lagoon, that shaft would have moved liquid manure in the liquid manure lagoon?

A Yes.

Q And, again, it -- it had a power source configured to provide power to move the vehicle both when the vehicle was ground-engaging and when the vehicle was floating?

A Yes.

Q And that power source would provide power to move the vehicle both when the vehicle was ground-engaging and when the vehicle was floating in a liquid manure lagoon --

A Yes.

Q -- just the same as in a muddy swamp?
A Yes.
Q And, again, the Truxor DM 5000 that had the wireless remote control, that was configured -- well, tell me, was it configured to enable and operate a remote from the vehicle to control the power source, control at least one of the speed and direction of the vehicle when the vehicle was ground-engaging, and control at least one of the speed and direction of the vehicle when the vehicle was floating in a fluid?
A Yeah.
Q And -- and --
MR. YACKEY: Objection, lacks foundation.
Q (By Mr. Leach, continuing) And it would be true if it was floating in the fluid of liquid manure?
A Yes.
Q We talked a little bit about the Truxor DM 5000 that was offered for sale, publicly disclosed, and publicly used prior to 2013 that had the Doro pump and a nozzle on it.

If the nozzle was directed at the surface of a manure lagoon, for example, would it be able to propel the boat and disrupt the liquid manure in the liquid manure lagoon?
A Yes.
MR. YACKEY: Objection, calls for speculation,

lacks foundation.

Q (By Mr. Leach, continuing) The Truxor DM 5000 with the Doro pump -- the Doro dredge pump on it, would you consider that to also be a liquid manure pump?

A It --

MR. YACKEY: Objection, lacks foundation, vague.

A -- could possibly be, yes.

Q (By Mr. Leach, continuing) But -- but you have to doubt that the Doro pump would pump liquid manure; is that correct?

A No problem.

Q Did the Doro pump include a pump housing and an impeller in the pump housing?

A Yes.

Q And did the impeller, when immersed in a liquid -- sorry. Strike that. When -- when the Doro pump -- I'm sorry. Strike that again.

When the Truxor DM 5000 was floating in a -- a liquid, would -- the Doro pump could be immersed under the liquid, correct?

A Yes.

Q And that would include the housing and the impeller, correct?

A Yes.

Q And so if the Truxor 5000 was placed in a manure lagoon, the housing of the Doro pump and the impeller would be -- could be placed under the liquid manure -- under the surface of the manure, correct?
A Yes.
MR. YACKEY: Objection, calls for speculation.
Q (By Mr. Leach, continuing) The Doro pump included conduits, right, or hose?
A Yeah.
Q And that included a fluid outlet that was in fluid communication with the liquid manure -- I'm sorry, with the liquid pump or the Doro pump wherein the liquid -- wherein the Doro pump would be configured to pump liquid through the fluid outlet?
A Yeah.
Q And if that fluid was liquid manure in a liquid manure lagoon, it would pump that, as well?
A Yes, of course.
Q And the --
MR. YACKEY: Shannon --
Q (By Mr. Leach, continuing) -- DM 5000 vehicle was capable -- or I'm sorry, had a power source, which was a diesel engine, that was configured to provide power to both the ground-engaging propulsion structure and the Doro pump?

A Yes.

MR. YACKEY: Excuse me. Can I get a -- a count on time, where we stand, on the record?

VIDEOGRAPHER: Counsels, we're at 4 hours and 22 minutes approximately.

MR. YACKEY: Thank you.

Q (By Mr. Leach, continuing) And I think we covered this, but the Truxor DM 5000, that included the -- the Doro pump tool, had a rotating shaft that was connected to an impeller in the housing, correct?

A Yes, yes.

Q And that pump was a centrifugal pump?

A Yes.

Q And -- and the Doro pump had an opening on the bottom of the housing --

A Intake, yes.

Q The intake, okay.

A Yes.

Q And the Truxor DM 5000 that was publicly disclosed, offered for sale and sold, and publicly used prior to 2013 included a pump, conduit, and nozzle to move fluid, correct?

A Yes.

Q And I think we established that the Truxor DM 5000 had a endless track?

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A Yes.
Q And -- and you equate that to a band?
A Yeah.
Q There was one on each side of the vehicle?
A Um-hum.
Q Did the diesel engine in the Truxor DM 5000 provide hydraulic fluid power to both the ground-engaging propulsion structure and the liquid manure mover?
A Yes.
MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) And I think we covered this, but the -- the tracks were operable at variable speed by the hydraulic motors?
A Yes.
Q Did the Truxor DM 5000, was it a vehicle where the location of the ground-engaging propulsion structure, power source, and the pump were selected to provide a desired location for a center of gravity of the vehicle?
A Yes.
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) We talked a little bit about the linkage that connected the Truxor DM 5000 to the -- the tool, and I think in some of the pictures it was this blue linkage that had and an up-and-down movement

via hydraulic cylinder and a --
A Tilt.
Q -- tilt.
A Yes.
Q By tilting the structure, would that adjust the angular orientation of the Doro pump?
A Yes.
Q And could you adjust the tilt by a hydraulically-powered articulation means?
A Yes.
Q And just -- I don't know if I just asked this, but did that include a hydraulic cylinder?
A Yes.
Q In fact, it had two of them, right?
A Yeah.
Q Did the linkage on the Truxor DM 5000 that attached the tools such as the Doro pump, did that have an angle adjustment structure, including a linkage, connected to a hydraulically powered articulation means to extend effective stroke length of the hydraulically powered articulation means, if you understand that?
MR. YACKEY: Objection, vague, calls for speculation, lack of foundation.
MR. LEACH: We can strike that.
Q (By Mr. Leach, continuing) The linkage that connected

the Truxor DM 5000 to the Doro pump, could you adjust the linkage such that it adjusted the angle of the Doro pump in the vertical plane?

A Yeah, by -- with a tilt you can adjust to the Truxor and away from the Truxor.

Q Okay. And I think we talked about this earlier, that articulation structure or that linkage would allow the Doro pump to be positioned along the underside of the vehicle body?

A Yes.

Q And -- and such that, given the pontoons, it could be placed between the wheels that the tracks ride on, correct?

A Yeah.

MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.

A Front wheels.

Q (By Mr. Leach, continuing) The front wheels.

A The free wheels, you say.

Q Yep.

So I'm going to go through this one more time, 'cause the language is a little bit different. But the Truxor DM 5000 that was offered for sale, sold, publicly used, and publicly disclosed prior to 2013 was an amphibious vehicle, correct?

A Yes.
Q It included a floatable vehicle body?
A Yep.
Q Did it include ground-engaging propulsion structure?
A Yes.
Q Did it include a fluid pump?
A What do you mean?
MR. YACKEY: Objection, vague.
Q (By Mr. Leach, continuing) A fluid pump, the -- the Doro pump.
A Not -- the Truxor -- it not included in the Truxor.
Q The -- the Truxor, though, with the Doro pump, it then included a -- a -- right. If you had the Truxor DM 5000 with the Doro pump on it, it -- it included a -- it could be sold with a -- a dredge pump, right, the Doro pump?
A Yeah.
Q Okay. And so when that was attached, it included that?
A Oh, yes, yes.
Q And it also included at least one fluid nozzle connected by a fluid conduit to the fluid pump, correct?
A Yes.
MR. YACKEY: Objection, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) And, again, the power source

was connect -- sorry.

Was the power source of the Truxor DM 5000 connected to a hydraulic pump and configured to provide power to the ground-engaging propulsion structure and the fluid pump?

A Yes.

Q And just to finish this off, the Truxor DM 5000 remote control version, that included -- did that include a remote control structure configured to control the ground-engaging propulsion structure and a flow of fluid from the fluid nozzle wherein the speed and direction of the vehicle is remotely controlled by an operator remote from the vehicle when the vehicle is ground-engaging and when the vehicle is floating?

A Yes.

MR. YACKEY: Objection, vague, calls for speculation, and assumes facts not in evidence, lacks foundation.

Q (By Mr. Leach, continuing) On the Truxor DM 5000, in some of the pictures it showed a nozzle spraying a fluid into the air using the Doro dredge pump.

Could you adjust the angular orientation of the nozzle relative to the boat?

A Yes.

Q What type of engine was included on the Truxor DM 5000?

A The first version has a Diahatsu diesel, and then it was upgraded with a Kubota diesel.
Q Okay. And is a diesel engine an internal combustion engine?
A Yeah.
Q The Doro pump tool that was used on the Truxor DM 5000, that included a pump housing that was configured for immersion within a fluid, right?
A Yes.
Q And if that fluid was liquid manure, it would be configured to be immersed in the liquid manure, correct?
A Yeah.
MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) The vehicle according to claim -- I'm sorry.
And if -- and the Doro pump was designed to be immersed in a fluid to obviate the need for priming, right?
A Yeah.
Q Is that a yes?
MR. YACKEY: Objection --
A Yes, yes.
Q (By Mr. Leach, continuing) Okay. And, again, if that --
MR. YACKEY: Objection, calls for speculation.

Q (By Mr. Leach, continuing) -- if that liquid, if it was driven into a liquid manure lagoon, it would be immersed in the liquid manure and not need priming to pump that --
A No.
Q -- either?
A No.
MR. YACKEY: Objection, vague --
Q (By Mr. Leach, continuing) Is that correct?
A Yeah, that's --
MR. YACKEY: -- calls for speculation, lacks foundation.
A That's correct.
Q (By Mr. Leach, continuing) What was used to adjust the nozzle or the angle of the nozzle relative to the boat on the Truxor DM 5000?
A You manually -- yeah, I don't remember what -- you have some -- some clamp, so you put it in the direction and tighten the clamp.
Q Would it have been easy to -- to automate that to use a hydraulic cylinder to -- and a linkage to move it?
A Yes, maybe.
MR. YACKEY: Objection, calls for speculation.
Q (By Mr. Leach, continuing) And -- and the boat had hydraulic --

A Yes.
Q -- power, correct?
A Yeah.
Q Going back to when the Truxor DM 5000 would be used to -- to dredge a pond or a ditch or something like that, can you just explain the process of driving it into the ditch or pond, operating the pump, and then driving it out? How -- how that process went to -- to dredge a -- a wetland or a swamp or a ditch?
A Well, you -- first, you have to put the dredge pump to the lift arm in the front and connect the hydraulic hoses. And then you also connect the pump hoses from the outlet from the -- from the pump. And you have a certain way you should take it up to the boat.

And then it depends on the -- where you should put this sediment that you pump up, if you just put it up on the ground or if you can -- you can connect these hoses so you can pump the dredging maybe 1- to 200 meters up on the land.

So then when you have -- connect these hoses, you usually -- it's easiest maybe when -- if you go backwards in the -- in the pond, because you have the hoses hanging on. Otherwise if you go in front, maybe you drive over these hoses.
Q Um-hum.

A So you back up out in the pond and then go to the area where you will dredge and lower the -- the dredge pump down. And then the technique is when you're working, you -- you go with a tilt and flip this -- what you say, the feeder --
Q Um-hum.
A -- the scoop feeder at the bottom.
So that's the -- and then the -- the area that you will go through --
Q Okay.
A -- and backwards up.
Q Okay. Going back to the Truxor DM 5000 that had the remote control, the remote control version of the Truxor DM 5000 that you saw operating in the lake in 2011, it was capable of receiving the Doro pump, correct?
A Yes.
Q And, in fact, it was made specifically to receive the Doro pump, correct?
A Yeah, yeah.
Q And you could have taken that unit, it would have been capable of driving it remotely into a manure lagoon, correct?
A Yes.
Q Could you have driven it through the manure lagoon --
A Yeah.

Q -- as it's floating in the manure lagoon?
A Yes.
MR. YACKEY: Objection, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) And could you have -- if you had the nozzle hooked up to it, could you have remotely turned the pump on to spray liquid manure into the lagoon?
A Yes.
MR. YACKEY: Objection, vague, calls for speculation, lacks foundation.
Q (By Mr. Leach, continuing) Could you have hooked a conduit to it and pumped liquid manure out of the liquid manure lagoon?
A Yes.
Q And you could have used the remote control to drive the vehicle around the manure lagoon?
A Yes.
Q And you could have used the remote control to drive the vehicle to the bank of the manure lagoon?
A Yes.
Q And could you --
MR. YACKEY: Objection, vague, calls for speculation.
Q (By Mr. Leach, continuing) Could you have driven the

Truxor DM 5000 remotely out of the manure lagoon?
A Yes.
MR. YACKEY: Objection, calls for speculation.
Q (By Mr. Leach, continuing) Could you change the flow rate of the fluid flowing through the Doro pump?
A Yes.
Q And how would you do that?
A You change the -- the flow from the hydraulic outlet that goes to the hydraulic motor on the pump.
Q Could you independently change the speed of the hydraulic pump and a hydraulic motor of the amphibious vehicle?
A Yes.
Q Could -- could you change the direction of flow of the fluid coming out of the nozzle on the Truxor DM 5000 by changing the direction of the boat itself?
A I don't know exactly how you mean.
Q Sure. If you have the DM -- the Truxor DM 5000, you've got the nozzle hooked up and you're spraying a fluid out of it. If you change the direction of the boat, that changes the direction of the -- the fluid --
A Yes.
Q -- coming out of the nozzle, correct?
A Yes, yes.
Q Would the DM 5000 remote control version be capable of

operating in a liquid manure lagoon with a nozzle such that you could spray the nozzle towards the surface of the liquid manure to agitate it?

A Yes.

MR. YACKEY: Objection, vague, calls for speculation.

Q (By Mr. Leach, continuing) Can you -- can you tell me where on the Truxor DM 5000 the motor was in relation to the hydraulic pump and the Doro pump?

A Yeah, the -- what you say? If you sit -- the drivers sit, and behind the drivers there would be the -- the cooler of the engine. And then behind the cooler there was a diesel engine, and then the hydraulic pump is connected to the diesel engine.

Q And -- and in relation to the Doro pump and the diesel engine, where was the hydraulic fluid pump?

A Yeah, it's what's -- everything -- the engine and the hydraulic pump is behind the driver, and in front you have the hydraulic pump -- the dredge pump.

Q Was the hydraulic pump between the engine and where the Doro pump would mount?

A No.

Q The hydraulic pump was behind the engine?

A Yes.

Q In the Truxor DM 5000 with the Doro pump, dredge pump

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attachment, could -- with the linkage and the extension, could you position the pump along the center of the vehicle body?

A Yeah, you can move it to the boat and from the boat, not from the sides.

Q Not on the side.

But what about could you put it underneath such that it's -- the pump housing is located towards the center of the --

A Not -- not maybe in the center of the boat, but not --

Q Could you -- could you put it such that it's behind the -- the wheels for the tracks?

A The front wheels, yeah, similar maybe in that areas.

Q Okay. Did the Truxor DM 5000 that was offered for sale, sold, and publicly used and disclosed prior to 2013 include, on the Doro pump or dredge pump attachment, a flexible tube or flexible conduit?

A Yes.

Q Did it also include a rigid conduit that could be used?

A No. It was -- this flexible tube is connected to the outlet from the pump.

Q Okay.

A And then after that, then they -- when they come on the land, it was roll out the flat hose.

Q Okay. So I think we just talked about this earlier. Is

the hydraulic pump positioned between the power source and the Doro pump?

A No.

Q No.

I'm handing you Defendant's Exhibit 23. Can you just look at that and just confirm that the hydraulic pump is behind the diesel engine?

A Yes.

Q Is that right, or is it --

A Yes.

Can I have something to point with? Can I borrow -- here is -- here is the cooler and here is the engine, and behind the engine is the hydraulic pump (indicating).

Q Okay. Thank you.

MR. YACKEY: Tom, can you confirm that the witness just marked up --

MR. LEACH: He -- he didn't mark anything. Sorry.

MR. YACKEY: -- or pointed to somewhere on DX 23, which is TRUX244?

MR. LEACH: Yes.

Q (By Mr. Leach, continuing) In the Truxor DM 5000 with the nozzle mounted to it as we looked at in some of the pictures, was the articulation structure or the -- the

linkage capable of putting -- placing the pump behind the -- the nozzle --

A Yes.

Q -- do you know?

A If you go --

MR. YACKEY: Objection, vague.

A If you go down with the -- to have the telescope go down and then you tilt it in --

Q (By Mr. Leach, continuing) Tilt it in?

A -- so you can go behind the nozzle.

MR. LEACH: Okay. Let's -- let's go off the record for a second. I just want to look at my notes. Guys, I think I'm about done.

VIDEOGRAPHER: The time is approximately 3:14 p.m. and we're going off the record.

(A recess was taken.)

VIDEOGRAPHER: We're back -- we are back on the record and the time is 3:15 p.m.

MR. LEACH: Mr. Olofsson, thank you for your time. At this --

THE WITNESS: Okay.

MR. LEACH: At this time, I don't have any further questions and I'll pass the witness --

THE WITNESS: Okay.

MR. LEACH: -- to Mr. Yackey.

MR. YACKEY: Good afternoon.

THE WITNESS: Good afternoon.

MR. YACKEY: I want to make it clear on the record that it's our understanding that Nuhn was going to be allocated sufficient time to cross-examine the witness today.

MR. LEACH: And you have sufficient time.

MR. YACKEY: And Nuhn is entitled to cross-examine the witness accordingly. We request that the deponent can stay past 5 p.m. to allow for proper cross-examination to occur and/or to carry this cross-examination deposition into tomorrow.

I understand, Tom, that you have a hard -- hard stop, but there's other attorneys that are entered in this case that can sit in on this deposition.

With that, Mr. Olofsson, I have some questions for you.

THE WITNESS: Okay.

EXAMINATION

BY MR. YACKEY:

Q You understand that you're here today offering deposition testimony in connection with a patent litigation case pending between Nuhn Industries and Bazooka Farmstar in the Southern District of Iowa,

United States District Court; is that correct?
A Yes.
Q All right. And you've testified that you haven't been paid for any of your testimony here today or your declaration testimony; is that correct?
A That's correct.
MR. LEACH: Objection, subject to the -- the clarification about providing reimbursement for costs and -- and paying for flights.
Q (By Mr. Yackey, continuing) Have you been retained as a consulting -- as a consultant by Bazooka or Merchant & Gould in this case?
A Yeah, I don't know if you could call me consulting, but I --
MR. LEACH: No.
A -- I'm --
MR. LEACH: I can answer that, no.
Q (By Mr. Yackey, continuing) Are you being paid for any consulting work by Merchant & Gould or Bazooka?
A No. Only the expense of when I stay here.
Q Are you testifying on behalf of yourself today?
A Yes.
Q Are you testifying here today on behalf of Truxor?
A No.
Q And you indicated that you retired from Truxor in, I

believe it was, July of 2023; is that correct?
A Yes, correct.
Q So you're no longer employed by Truxor, correct?
A No, I'm not.
Q Are the attorneys for Merchant & Gould representing you?
A Yes.
Q Do you know when their representation of you started?
A I don't know if it when the meeting starting or if it's when I come here. I don't know. For the meeting they're representing me, yes -- the hearing, yes.
Q Were they -- were they representing you when you executed your declaration on February 27th, 2023?
A No.
Q No?
All right. Do you have a mech -- a bachelor's degree in mechanical engineering?
A No.
Q Do you have any higher degree than a bachelor's in mechanical engineering?
A I don't know what the -- the levels comparing to Swede's education are. I only have a gymnasium -- two years gymnasium education.
Q Okay. Do you have any experience with livestock manure?
MR. LEACH: Object to form.
A No, I don't have.

Q (By Mr. Yackey, continuing) What does the word "manure" mean to you?
A Yeah, I don't know if I should say it, but shit. But it smells not good, yeah.
Q Would it be farm animal excrement?
A Yes.
MR. LEACH: Object to form, vague.
A Yes, I -- I connect it with farming, yes.
Q (By Mr. Yackey, continuing) All right. So how many years of experience do you have in marine vehicles?
A Yeah, I have been employed in this company for almost 30 years, so --
Q How about for off-road vehicles?
A No.
Q No experience in off-road vehicles?
A No, not in the -- in manner of my employment in -- in the company, but in private way maybe.
MR. LEACH: Object to form and vague. The -- the Truxor vehicle is an off-road vehicle.
MR. YACKEY: Tom, I'd -- I'd like the witness to answer the questions.
MR. LEACH: Well, I just want to make sure you're -- you're being fair here and -- and --
Q (By Mr. Yackey, continuing) How many years of experience do you have in designing fluid pumps?

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A Yeah, when we start this project in 2009, I think, where we make our own dredge pump. But before that, we have the dredge pump and we bought parts from -- from Mamec.

THE COURT REPORTER: Could you spell that for me?

THE WITNESS: Mamec, M-e-m-e-c (sic).

THE COURT REPORTER: E-c. Thank you.

Q (By Mr. Yackey, continuing) Have you ever been a livestock farmer?

A A farmer, no. No farmer.

Q No.

Are you -- are you or have you ever been a commercial manure applicator?

A No.

MR. LEACH: Object to form.

Q (By Mr. Yackey, continuing) So are you a commercial manure applicator?

A No.

Q Have you ever been one?

A No.

Q Before being involved in this case, were you familiar with manure agitation equipment?

A No.

Q Do you have any personal experience with manure lagoons?

A No --

MR. LEACH: Object -- object to form.

A -- not personal, only if I have seen on Internet or so.

Q (By Mr. Yackey, continuing) Had you ever seen a manure lagoon on the Internet prior to your involvement in this case?

A Yes, I have. Yes.

Q Do you recall when that was?

A Oh, in the lifetime, I would say in the time of 30 years I've been in the company, I don't know exactly what year it could be.

Q But you've never seen a manure lagoon in person?

A No, in -- not in real, no.

Q Was the Truxor DM 4700 or DM 5000 ever marketed for use in manure lagoons?

A No.

Q Do you know whether the Truxor DM 4700 or DM 5000 was ever used in manure lagoons?

MR. LEACH: Object to form.

A I -- I can't -- I can't swear what -- what the customer used the machine for. But it wasn't perform -- how would you say? It was not put into market for -- to do that things. But what the customer do with it, we don't have fully control over, so I couldn't -- I couldn't say if they have or not.

Q (By Mr. Yackey, continuing) All right. So sitting here

today, you can't tell one way or another whether a customer ever used a Truxor in a manure lagoon?

A No, I can't say.

Q Do you know whether the Truxor DM 47 or DM 5000 was ever used to pump liquid manure?

MR. LEACH: Object to form.

A Yeah, it's in different countries. Because we sell our products -- maybe 90 percent of our products go for export, so only between five and 10 percent of what we produce stays -- sells in Sweden.

Q (By Mr. Yackey, continuing) But sitting here today, you have no knowledge that the Truxor DM 4700, the DM 5000 was ever used to pump liquid manure --

A No.

Q -- correct?

A I don't know, no.

Q Do you ever -- do you have any knowledge as you sit here today whether the Doro pump was ever used to pump liquid manure?

A No, I don't know.

Q Okay. So I believe you testified earlier today that you designed the Doro pump; is that correct?

A Yes.

Q Do you have any evidence sitting here today that you designed it to pump liquids with a certain total solids?

A I don't know what type of evidence I could point on. It's -- I don't think it's any document here that say created by Reidar. But I know what I have been done, and it's not -- it's not the stamp that say Reidar made this, no, that's --

Q Do you have any documentation that shows testing of the Doro pump and what it can pump?

A Yeah, a document -- we must document, what you say, the flow, how much flow it could pump.

Q Did you look for any evidence showing that?

A Yeah, we make tests on the factory and document how much it could pump. But we usually just use -- use water for -- for these tests.

Q Do you have any evidence of those test results?

A Yeah, I think it -- it will have some documents that say how much it could produce. But it's not something I have with me, no.

Q Did you look for those documents?

A Not specifically for -- for this.

Q Was the Doro pump able to pump -- strike that.

Did you try to find any documents at Truxor regarding the requirements -- the design requirements of the Doro pump?

A I don't --

MR. LEACH: Object to form.

A What -- what do you mean with that?
Q (By Mr. Yackey, continuing) Do you have here today any documents that show the performance characteristics of the Doro pump?
A No.
Q Are you aware of any that exist at Truxor?
A Yeah, I think we have something, yes.
Q What does suspended solids mean to you?
A It's some liquid you can -- you can pump with Doro pump with no problem.
Q Is suspended solids a term that you used in your daily work at Truxor?
A No. It just not that, what you say, specific on what -- what we will use to dredge pump with, because it was normal sediments from the bottom we dredge.
Q Before your involvement in this case, do you ever recall describing that the Doro pump could pump a certain amount of suspended solids?
A I think they make some -- some tests in the -- in Germany and they come up with some about the -- I think just for that test, it was 18 percent of, what you say, solid in the water that they pump.
Q Who is "they"?
A This was a -- our retailer in Germany.
Q Do you know who that -- do you know --

A Yeah.
Q Do you have that name?
A Sel -- Selder is his last name. He have his own website on the Internet. Sigmund -- Sigmund -- Sigmund selder his name, but I don't really know what the company name is right now.
Q Are you aware of any documents at Truxor that describe the total solids that the Doro pump could pump?
A No. I have asked other guys at the -- at the company, but they couldn't find -- we don't -- they don't have any document that can tell us how much percent of silt or sediment you can pump.
Q Did you ever test the Doro pump and whether it could pump liquid manure?

MR. LEACH: Object to form.

A Not testing on liquid manure, no.
Q (By Mr. Yackey, continuing) I believe you testified earlier today that if the surface is very hard, you need the feeding wheel in order to break it up for the Doro pump to pump it --
A Yes.
Q -- is that correct?
A Yes.
Q So if you have a very hard surface, would the Doro pump have been able to -- to pump without the feeding wheel?

MR. LEACH: Object to form.

A No, I don't think so. It -- it pump the water, but it couldn't take any sediment with it.

Q (By Mr. Yackey, continuing) So the Doro pump could not take any sediment with it without the feeding wheel?

MR. LEACH: Object to form in the sense that it mischaracterizes his testimony.

A It depends how hard the surface is. So you maybe have to try if you need this screw or not.

MR. LEACH: And -- and to clarify, you're talking about the bottom of the -- the lake, right?

THE WITNESS: Yeah, yeah, yes.

MR. LEACH: Okay.

MR. YACKEY: Tom, again, I'd like the witness to -- to testify.

MR. LEACH: Well, I just want to make sure the record is clear and that there's no confusion. You guys have a habit of taking things out of context.

MR. YACKEY: Tom, I don't think that's necessary here today.

Q (By Mr. Yackey, continuing) Earlier you testified that the Truxor DM 4700 and DM 5000 -- strike that.

Earlier you testified that the Truxor DM 5000 had drive wheels, correct?

A Yes.

Q And that only two of those drive wheels were powered; is that correct?
A It's one drive wheel at each pontoon. The drive wheels is -- is in the back of the pontoon and in the front you have the free wheels that the band track goes around.
Q Did those drive wheels engage the ground?
A No.
Q Do you still have the exhibits that were introduced by Mr. Leach in front of you?
A Yes.
Q All right. So let's go to Defendant's Exhibit 15, so the very first one, I believe.
A 15, yes.
Q And I believe it's Bates labeled with TRUX and the last three digits are 245?
A Yes, it is, yes.
Q Do you recall when you created this document?
A This document, maybe six, seven years ago.
Q Okay. When did you -- strike that.

Did you -- did you obtain this document from Truxor?
A Yes, I make it.
Q How did you get it from Truxor?
A Yeah, I -- I make this document when I work there. And now before I go here, I go to the factory and collect

all these documents by myself.
Q So when did you obtain this document?
A This document, I think I -- if you want really what day, I think it could say -- if you look at the -- the file, I think there would say what day it was -- I make in PDF of that -- of this. So the date of the PDF is the date when I pick it up here from the factory.
Q But that was after you retired from Truxor?
A Yes. That was now for maybe one month ago.
Q Do you recall when you gave it to Merchant & Gould?
A Yeah. There is some mail conversation that can confirm when. But maybe three, four weeks ago.
MR. LEACH: This document?
THE WITNESS: Yes, when I sent it to you.
MR. LEACH: Okay. I'll have to look.
Q (By Mr. Yackey, continuing) Let's go to --
MR. LEACH: But I just want to caution the witness not to get into the communications between you and I --
THE WITNESS: Oh, yeah, yeah.
MR. LEACH: -- regarding -- but -- but you can answer the questions factually.
Q (By Mr. Yackey, continuing) I'm not asking for the content of your communications. I'm just asking for --
MR. LEACH: Sure.

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Q (By Mr. Yackey, continuing) -- the date, if you recall.
A Then it must go back to the -- some email conversation, maybe, if you want exact date.
Q Okay.
A Or maybe I have this with me when I come now. I think maybe this -- just this -- this document maybe I don't send by email.
Q Okay.
A I have it -- yes, this document, I have it on a memory stick when I came -- when I came here now.
Q Okay. So let's now go to Defendant's Exhibit 16, and I believe it starts with Bates label number on the bottom right of TRUX246?
A Yes.
Q Same answer, did you obtain this recently after your retirement from Truxor?
A Yes. This I was in the factory and -- and take out there. And I think I have -- also this I have on my memory stick when I come here.
Q And the memory stick that you brought with you, was that all documents that you obtained personally from Truxor?
A Yes, yes.
Q Yes?
A Yes.
Q Did someone at Truxor find documents for you and load

them onto that, or did you do it yourself?
A I do it myself by the computer there -- my old computer.
Q Okay. Do you know who created this document?
A I suppose this document is created by the -- the owner of the company at this time.
Q Is that just a guess?
A No, not a guess. I'm sure of that, because he was -- yeah, he -- he sells the machines and he was pretty accurate that you hold the price list updated.
Q All right. So let's go to Defendant's Exhibit 17 which, I believe, has a Bates label BAZ15_26657?
A Yes.
Q Is this also one that you got on the -- brought on the jump drive with you?
A Yes.
Q Had you seen this document before your involvement in this case?
MR. LEACH: Object to form.
A I don't know if I seen exactly this document, but similar documents we always have for -- for all of our products, so --
Q (By Mr. Yackey, continuing) So you don't -- you don't know whether you've seen this document before your -- this specific document before your involvement in this case, correct?

A No, I don't know.

MR. LEACH: Object to form.

Q (By Mr. Yackey, continuing) Do you know who created -- do you know who created this document?

A This document, I believe, is the -- the production manager on -- on the factory that project this.

Q Is that just a guess?

A No. I know.

Q How so?

A How so? I have brought -- I worked there for 30 years, so I know, okay?

Q Is there -- for someone like me looking at this without your 30 years of experience, is there something on this document that I could look at that would indicate to me or some other, you know, person similarly situated that this was created by your production manager?

A I don't know what -- what can say more on my word that -- that it was the production manager who made this document.

I have no -- no real proof for you, but I have sworn on my oath, okay?

Q All right. So let's go to DX 19 --

A Yep.

Q -- which I believe are a compilation of photographs --

A Yes.

Q -- with the Bates labels TRUX1 through 8; is that correct?
A 1 through 8, that's correct.
Q Do you know sitting here today who took these photos?
A I'm not sure who, but it could -- it could be me. But I'm not sure if it's me or not.
Q Do you know whether you were present when these photos were taken?
A I'm not sure if -- I've been to this lake many times, but I don't -- I can't swear that I was there right at this point.
Q So if we turn to TRUX7, which I think is the second-to-last page --
A Yeah.
Q -- so were you present when this photo was taken?
A No.
Q Do you know what's being -- do you know what this photo is showing?
A Yeah, it shows that they pump up with the dredge pump some sediment from the bottom of this lake, but it's not the lake that is in the Photo No. 1.
Q Where -- where is the Truxor DM 5000 in this photo?
A I think the -- the Truxor who is working here is in Picture No. 4.
Q But there's no Truxor DM 5000 in this photo, correct?

A Yeah, there is. The dredge pump is connected to the Truxor DM 5000.
Q Can you see the dredge pump in this photograph?
A Yeah, it's below the surface. But see, the hose come --
MR. LEACH: Scott, I think you're on -- he's on TRUX4 and I think you're on TRUX7.
MR. YACKEY: Yes, I'm on 7.
MR. LEACH: Yeah.
MR. YACKEY: Sorry. My -- if he can go back to 7.
THE WITNESS: Okay.
MR. LEACH: He was telling you that -- that what's showing in 7 is coming from TRUX4 is what you testified to.
A Okay. Photo No. 7?
Q (By Mr. Yackey, continuing) Correct.
A Yeah.
Q There's no DM 5000 in this photograph, correct?
A No, not in this photo. No.
Q Is there a dredge pump in this photo?
A No.
Q So is it possible that this is from something else other than the Truxor DM 5000?
A I doubt that.
Q Pardon?

A I doubt that it's from another -- from another situation, because all -- all -- all of these photos are dated at the same date and it's connected from -- from Photo 4, 5, 6, and 7.

You'll see from Photo No. 4 is the dredge pump. And then the hoses from the dredge pump up on the land on Photo No. 5. And on Photo No. 6, you'll see also these hoses and the Truxor in the background. And Photo No. 7 is when this dredging sediment is coming up from the dredge pump.

Q All right. Earlier I believe you testified that you tried to keep the DM 5000 as light as possible; is that correct?

A Yes.

Q And that you were concerned about weight of the vehicle?

A Yes.

Q Why is that?

A Yeah, because of the, what you say, maneuverability of the Truxor. If it gets too heavy in the water, it's no problem. But when you drive up on land and it's much heavier, it's -- it's harder to -- to turn. And it also go deeper in -- in the water when it is heavier.

Q Do you have DX 28, 29, and 30 in front of you?

A Yes.

Q Do any of these documents describe remote control

operation of the Doro pump?

MR. LEACH: Object to form.

A The DX 29 is just telling that our supplier have got this radio in stock and they say it looks good and they will drive some tests that day and then send this radio day after. And the radio that they confirm to is on the DX 28 document.

Q (By Mr. Yackey, continuing) So I don't know if you completely answered my question.

Those exhibits do not talk about remote control of the Doro pump; is that correct?

A No, it's not the Doro, it's on the DM 5000 Truxor, yes.

Q And they don't talk about remote control of the Doro pump --

A No, because you have --

Q -- on the DM 5000, correct?

A Yeah. But you can't -- it's no to remote control, only the dredge pump as it -- as it stand. You must connect the dredge pump to the DM 5000 so you can work with it.

So that's why -- why you can't have the -- this to drive the 5000. And then you can also at the same time drive the dredge pump with the remote control.

Q Is there -- is there anything in DX 28 that talks about the Doro pump being mounted to the DM 5000 --

A No.

Q -- radio control?
A No.
Q Is there anything in DX 29 about the Doro pump being mounted to the DM 5000 and being remote control?
A No.
Q Is there anything in DX 30 about the Doro pump being mounted to the DM 5000 and being remote control?
A No.
MR. LEACH: Object to form.
A No.
Q (By Mr. Yackey, continuing) No?
Do you recall viewing DX 31? It was a video?
A Okay.
Q Did that video show the Doro pump mounted to the DM 5000?
A No.
Q And for DX 31, were you present when the video was taken?
A I think I was. I can't swear on as I was just on the occasion with the -- in the film. But it could be me who holding the camera to -- to film, but I -- I don't -- not really sure if it was me or someone else.
Q Were you present when the DM 5000 was remotely controlled driven into the lake?
A Yes, I was.

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Q All right. So let's turn to DX 32.
A This is DX 32. Okay.
Q This is your declaration, correct?
A Yes, it is.
Q Did you write this declaration?
A No.
Q Do you know who wrote it?
A Yeah, I think it was the -- the CEO now for Truxor Wetland Equipment, Mr. David Arnoldsson.
Q He -- he wrote this declaration?
A Yeah, I suppose so. I'm not a hundred percent sure of that. But he gave it to me to read and write -- write my signature.
Q Did you make any revisions to this declaration --
A No.
Q -- from what he gave to you?
A No.
Q Did you -- did you review all the exhibits to this declaration prior to signing it?
A Yes.
Q Did you prepare the exhibits to this declaration?
A No. I think it was Mr. Arnoldsson, also.
Q Did Merchant & Gould provide you any facts that formed the basis of your testimony in this declaration?
A No. This facts was all from -- from -- from Dorotea

Mekaniska and Truxor Wetland.
Q Did Merchant & Gould provide you with any facts to form the basis of your testimony here today?
A No.
Q Was it you that provided the exhibits to your declaration to Merchant & Gould?
MR. LEACH: Object to form.
A I don't really understand what you mean.
Q (By Mr. Yackey, continuing) The exhibits that are attached to your declaration, was it you that provided them to Merchant & Gould?
A No, it was not me. It was by Arnoldsson, also.
Q So let's look at Paragraph 2. Can you read what Paragraph 2 says?
A Is it -- where is -- where it -- I say I am being compensated or what? Is it that?
Q Correct.
A Okay. I am not being compensated for my testimony or involvement in this matter. I have no financial interest in the outcome of this proceeding.
Q And I believe you stated that other than reimbursement for costs, that is still correct?
A That's correct, yeah.
Q Do you know if Truxor is being paid in any way by Merchant & Gould or Bazooka?

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A I don't think so.
Q Is Truxor paying you in any way --
A No.
Q -- for your --
A I am retired now, so I have no -- no salary from Truxor, no.
Q All right. Let's turn to Paragraph 3.
A Yeah.
Q And it says that it was Truxor's standard business practice to make its marketing materials and brochures publicly accessible, for example, by posting them on its websites under the Brochures tab.

Do you see where it says that?

A Yeah.
Q Did you have any responsibility over Truxor's website in 2013?
A No.

MR. LEACH: Object to form.

A No, I haven't.
Q (By Mr. Yackey, continuing) How about before 2013, were you responsible for posting things to Truxor's website?
A No.
Q Did you ever post anything to Truxor's website in 2013 or before?
A No.

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Q So let's turn to Paragraph 4. It says Truxor's website, Dorotea Mekaniska, was indexed and searchable by a commercial Internet search engine prior to August 19, 2013.

Do you see that?

A Yeah.

Q Is that correct?

A Yes.

Q Did I -- did I read that correctly?

A Did I read --

Q Did -- did I read --

A Yes, yes, yes, you did -- yes, you do.

Q What's your basis that Truxor's website was actually indexed and searchable prior to August 19, 2013?

A I not understand the question.

Q What facts do you have to support the statement that Truxor's website was indexed and searchable by a commercial Internet search engine prior to August 19, 2013?

A Yeah, I have self tried it on the -- on the Internet and make this search, and I get up the same results.

Q Did you do that prior to August 19, 2013?

A No.

Q So sitting here today, do you have any personal knowledge that Truxor's website was indexed and

searchable by a commercial Internet search engine prior to August 19, 2013?

MR. LEACH: Object to form. And are you saying aside from what's provided in his declaration?

A I -- I don't know if I can say that I, prior to 2013, looked at -- with this searching criterias, I can't say, no.

Q (By Mr. Yackey, continuing) So you cite to Exhibit B in your declaration in support of some of the statements in Paragraph 4.

Do you see that?

A Yeah, what you say, on the -- on the point of No. 4.

Q It says: For example, searching Dorotea Mekaniska on Google using a custom date range of before 8-19-2023. And do you see the sentence ends in "See Exhibit B"?

A Yes.

Q So if we go to Exhibit B, I believe it starts as the number on the bottom right-hand corner, BAZ15_1129?

A Yes.

Q What's the date at the top hand -- top left-hand side of that exhibit?

A Yeah, it seems like this search was made in 31st January '23.

Q Did you take this screenshot?

A No. I think it -- it was Mr. Arnoldsson.
Q You see there's an initial T at the top right-hand side. Do you know what that could be?
A No, I don't know what it could be.
Q All right. So if we go to Paragraph 5 of your declaration --
A Yes.
Q -- this paragraph starts: Truxor's DM 5000 and DM 4700 amphibious vehicle products and their dredging capabilities were the subject of news publications prior to August 19, 2013.
Did I read that correctly?
A Yes.
Q And then it says See e.g. Exhibit C, accessible at, and it's got that long URL that --
A From Poland, I think.
Q Right. So if we go to Exhibit C --
A Yes.
Q One moment. Bates BAZ15_1132 --
A Yes.
Q -- do you recall when you first saw this article?
A No. This -- the first time I saw it when Mr. Arnoldsson come with this document to me.
Q And you don't speak or read Polish, do you?
A No.

Q All right. So if we go back to Paragraph 5, the second sentence there starting: Truxor appreciated being published in news publications because they helped to stir attention for Truxor's products and increased Internet traffic to Truxor's website.

Do you see that?

A Yes.

Q Did I read that correctly?

A Yes.

Q Do you know whether this news article increased Internet traffic to Truxor's website?

MR. LEACH: Object to form.

A No. I -- if it's -- I don't know what -- what kind of web page it is, if it's a newspaper on -- on the Internet or what. I don't know.

Q (By Mr. Yackey, continuing) So you don't know sitting here today whether this news article referenced in Paragraph 5 increased Internet traffic to Truxor's website?

MR. LEACH: Object to form.

A No. I -- it's not me who have -- make this search, so -- but, yeah, I assume it's -- it's accurate. Because if you have one -- one part that it's translated from Polish to English, and in the middle of that first page, you have a photo, and just above the photo there's

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a date of 21st April 2012.
Q (By Mr. Yackey, continuing) But you stated in your declaration that news publications helped to stir attention for Truxor's products and increased Internet traffic to Truxor's website; is that correct?
A Yeah, if -- if this comes out in the Internet, it -- I don't see why it not increased the interest of our product.
Q Do you have any -- any facts to support that it increased Internet traffic to Truxor's website?
A If I have any faster?
Q Any facts to support.
A Any facts. No, I -- nope. I haven't done any search searching about that.
Q So if we turn to Paragraph 10 of your declaration --
A Yes.
Q -- it says: Exhibit D was freely available for download on Truxor's website at least as early as August 18, 2010.

Did I read that correctly?
A Yes.
Q And then after that it says See Exhibit A; is that correct?
A Yes.
Q So if we go to Exhibit A, can you find where in

Exhibit A that it states that this brochure was available at least as early as August 18, 2010?

A Yeah, if you see on that page number that ends with 1107.

Q Okay.

A Okay.

Q I'm on that page.

A Yes. And you see in there upper right corner it says 17 February 2010. And this is the -- the search were made for that date, and then you see the website, and there you can download brochures.

Q So if we turn to Paragraph 14 of your declaration --

A Yeah.

Q -- there's a -- what appears to be a screenshot in Paragraph 14.

Do you see that?

A Yes.

Q What is this screenshot from?

A I don't really know what it's from, but probably from -- from our -- from Arnoldsson's computer. And he has search in our -- our -- what you say, where we -- where we save all these documents.

Q Did you take this screenshot?

A No.

Q So if we turn to Exhibit E to your declaration, I

believe it starts BAZ15_1155 --

A Yes.

Q -- can you find a date on Exhibit E that shows a date of publication for this brochure?

A Not the date, but the year.

Q So there's nothing in Exhibit E that shows the month and/or day that this brochure was published?

A No, not -- only the year, yes.

Q So let's turn to Exhibit F --

A F.

Q -- which is BAZ15_1176.

A Yes.

Q Can you find a date on this exhibit that shows a date of publication for this brochure?

A No. Only the year.

Q So can you find a date that shows what month and/or day that this brochure was published?

A No.

Q So let's turn to Paragraph 19 of your declaration.

A Yes.

Q Actually, let's start with 18. It says: Exhibit G is a true and correct copy of Truxor's Truxor amphibian tool carrier.

Did I read that correctly?

A Yes.

Q And then Paragraph 19 says: Exhibit G was posted online on a website belonging to Aquaclear Water Management, one of Truxor's UK distributors. The URL posting that includes -- the URL posting that includes Exhibit G, aquaclearwatermanagement.com.

Do you see that?

A Yes.

Q Did you post Exhibit G to Aquaclear's website?

MR. LEACH: Object to form.

A No.

Q (By Mr. Yackey, continuing) Did you have any involvement with Exhibit G's posting to Aquaclear Water Management?

A No.

Q Do you have any facts or evidence here today to support the statement that it was posted online on a website belonging to Aquaclear Water Management?

MR. LEACH: Object to form. Aside from what he's already testified to?

A Yeah, I think if you have -- we make this -- this search with the -- this year and date. And then in that searching, this Aquaclear Water Management comes -- comes up. So that's the proof.

Q (By Mr. Yackey, continuing) So let's go to -- at the very end of Paragraph 19, do you see where it says Exhibit J?

A Yes.
Q And let's go to Exhibit J.
A Also Exhibit G.
Q G is the brochure.
A J, yes.
Q So let's look at J.
A J. Okay.
Q And I believe it starts BAZ15_1241?
A You say Exhibit G?
Q J.
A J. J. Okay. Yeah, 1241.
Q Correct, 1241.
A Yes.
Q And what's the date on the top left-hand side of the corner of this page?
A Yeah, this was made -- the search was made in 31st January '23.
Q Did you run this search?
A No.
Q Did you take this screenshot?
A No.
Q Can you find anywhere in this exhibit the URL that you referenced in Paragraph 19?
A Yeah. If you go to Page 43, in the middle there it says Aqua -- Aquaclear Water Management from December 13,

2011.

Q Does that URL reference -- does that -- does that show Truxor there?

A It's not -- maybe if you open that, because it says pumps and amphibious machines, so --

Q But do you -- do you see Truxor in Exhibit J at what you're pointing to in 1243?

A Not in this particular place I don't see Truxor. But in there -- if you look at the first page, at 41, on the top there, but that's from Megator and there it's Truxor amphibious tools December 1st, 20'9.

And also under that you have Truxor multi-functional amphibious machine, and it's date February 11th, 2010.

Q But my question is on 1243, the aquaclearwatermanagement.com link there does not show Exhibit G; is that correct?

A It's not show the name Truxor, no.

Q All right. Returning to Paragraph 19 --

A Yes.

Q -- the second sentence there it says: The URL posting that includes Exhibit G and then -- was indexed and searchable by a commercial Internet search engine prior to August 19, 2013; is that correct?

A Yes.

Q But, again, what is your factual basis sitting here today that the URL http://www.aquaclearwatermanagement.com //docs/truxor_2012_ENG.pdf was actually indexed and searchable by a commercial Internet search engine prior to August 19, 2013?

A Yeah, I don't find any, as I say, PDF that you can download from Aquaclear Water Management. But I suppose if you click on that link, you come to another website where you can do it.

Q But you testified you did not run the search or take the screenshot of what's shown in Exhibit J; is that correct?

A Yeah, I don't do this screenshot. It was --

Q So you don't know sitting here today whether clicking that link shown in the screenshot would actually take you to what is alleged to be Exhibit G; is that correct?

MR. LEACH: Object to form.

A Yeah, I can't -- as I say, I can't see the direct link to this website and what it says under Paragraph 19 here.

Q (By Mr. Yackey, continuing) So let's -- let's talk about -- a little bit more about the -- your testimony regarding remote control of the DM 5000.

A Okay.

Q Was that product ever commercialized?
A No. It was only on the prototype level.
Q Why was it not commercialized?
A Yeah. If the market don't want it, how can we sell it?
Q So you're saying the market didn't want a remote control?
A No, not --
MR. LEACH: Object -- just -- you've got to give me a second to object. Object to form, calls for speculation.
A Nope, not at that time.
Q (By Mr. Yackey, continuing) Has Truxor ever made a commercial product -- commercially available DM 5000 with remote control?
A Not the DM 5000. But the -- the type that they produce now, they have it for sale, yes.
Q Do you recall when that one first -- the -- the remote control version they have on sale now first went on sale?
A No. I went there in June, I think, and then they show me how it works and they test drive it then. But I don't know when it goes to -- commercially to the market.
Q When you say June, do you mean --
A June this -- yes, this year, yeah.

Q -- 2024?
A '24, yes.
Q So prior to June of 2024, Truxor never had a remote control DM 5000 that was commercially available --
A No.
Q -- is that correct?
A Yes, that's correct.
Q Do you know how long it took to put the remote control on the DM 5000?
A How long? If you look at the email conversation, I think it was in December 2010 they talk about and show the picture of the -- how it looks, this part. And then it was in the -- if I remember, in the beginning of 2011 they send -- send the parts to us for the -- so I think it's in the summer 2011 it happens that we test drive the prototype.
Q Do you know whatever happened to that project?
A I think this part is still in the house at the factory.
Q Would you have ever driven the Truxor DM 5000 into a liquid manure lagoon?
A No.
MR. LEACH: Object to form.
Q (By Mr. Yackey, continuing) You never have driven a Truxor DM 5000 into a liquid manure lagoon, correct?
A No, I haven't.

MR. YACKEY: All right. Let's go off the record and take a short break, if y'all don't mind.

THE WITNESS: Okay.

VIDEOGRAPHER: The time is approximately 4:32 p.m. and we are going off the record.

(A recess was taken.)

VIDEOGRAPHER: We're back on the record. The time is approximately 4:42 p.m.

Q (By Mr. Yackey, continuing) All right. I believe earlier you said that Merchant & Gould's representation of you didn't start until today; is that correct?

MR. LEACH: No, that's not correct.

A I don't know when we should say it start. I come here on Monday.

MR. KELLA: Oh, I'm sorry. Is there a -- in listening, I don't know if there's a microphone mix-up after Mr. Yackey's question. I -- I thought I heard Tom answering the question. Is -- is -- who's -- who's answering the questions here?

MR. LEACH: Yeah, Michael, again, you're -- you shouldn't be talking in this depo. It's Scott Yackey that's taking it. But --

MR. KELLA: Tom, you shouldn't be the answering the question.

MR. LEACH: If you want me to look up -- if

you want me to look up the date when that occurred, I can provide that to you.

MR. YACKEY: Tom, I'm asking the witness when the representation started.

MR. LEACH: Yeah, and we represent him. And I'm telling you I can provide that date if he's not able to remember.

THE WITNESS: Yeah, I -- I don't know if -- if I know when they start to represent me. Because I -- I came here to Minneapolis at Monday, and I think -- and we met -- on Tuesday I came here and meet you the first time --

MR. LEACH: Sure. But --

THE WITNESS: -- the 3rd.

MR. LEACH: But we have -- we have communicated prior to then about that issue.

THE WITNESS: Yeah, by email you mean?

MR. LEACH: Yeah, but still.

THE WITNESS: Okay. Okay. Okay.

MR. KELLA: I'm going to -- I'm going to jump in, just 'cause this -- this sounds like a record related to just discovery in the case as a whole.

It's my understanding from past meet-and-confers that documents may be being withheld on the basis that the lawyers, Tom, at

Merchant & Gould are representing the witness here.

You know, the witness is saying he's represented as of today or as of a couple days ago.

MR. LEACH: No, that's not correct.

MR. KELLA: You know, we know the law on attorney-client privilege does not rest on whether the law firm says that it represent the client. The representation is a two-way street, Tom.

So if the witness's testimony is that he's represented as of today --

MR. LEACH: That's not -- that is not the witness's testimony.

MR. KELLA: -- it's highly improper for you to tell the witness otherwise.

MR. LEACH: Quite frankly, Michael, you shouldn't even be speaking in this deposition. So I'll leave it to Yackey to -- to handle it, but please refrain -- refrain from speaking during this deposition, okay?

THE WITNESS: Yeah, for -- for me, you have to clarify what you mean when the start. If it -- is it the start --

MR. LEACH: Let's -- let's take a break. We're going to take a break and I'm going to talk to this witness, because this does involve

attorney-client communication and -- and that, so I can explain to him what that means.

MR. YACKEY: You can take a break.

MR. LEACH: Are you guys okay with that?

MR. YACKEY: Yes.

MR. LEACH: Okay.

VIDEOGRAPHER: The time is approximately 4:45 p.m. and we're going off the record.

(A recess was taken.)

VIDEOGRAPHER: We are back on the record and the time is approximately 4:48 p.m.

MR. LEACH: Okay. Scott, if you want to ask your question again, I think I've provided some clarification to Mr. Olofsson who's not, I guess, well-versed on -- on the U.S. legal system a bit.

But anyways, ask your questions and he can provide a response.

Q (By Mr. Yackey, continuing) Mr. Olofsson, are -- are attorneys at Merchant & Gould your attorneys?

A Yes.

Q When did their representation of you start?

A I think it was sometime in the middle of June this year.

Q Of 2024?

A Yes.

Q Have you sought legal advice from Merchant & Gould?

A Yes. I not really sure exactly what you mean, but legal advice from them.
Q Yes. Have you sought legal advice from Merchant & Gould?
And I want to clarify that I'm not asking what the legal advice was, I'm just asking if you sought legal advice from Merchant & Gould.
A Okay. Yes, that's -- okay. Yes.
Q The answer is yes?
A Yes.
Q Did you sign an engagement agreement with Merchant & Gould?
A Yes, I make -- we make a document. But if it was for this -- that purpose -- I'm not sure really if it's for this -- that purpose that you -- we talk about now.
I get a document that I -- I write under. But if it -- it include that -- what you're asking now, I'm -- I'm not sure. Just one document I have signed.
Q When did you sign that?
A Yeah, it was maybe in June. End of June maybe.
Q Is that the same time that you sought legal advice from Merchant & Gould?
A Yeah. It's approximately at the same time, yes.
Q So who reached out to you first about this case?
A Yeah, it was a lady named Klara who has worked for --

for law bureau in Sweden that contact me. But he -- she have -- have been in contact before when -- when I sign these documents last -- last year. And he -- she had contact with Mr. Arnoldsson.

So they spoke to each other, and then Arnoldsson took up -- take out these documents that I sign that it was correct last year in -- what you say, in February last year.

And this year in the beginning of June, I think it was, then this Klara, he -- she called me up and ask me if I can help this Merchant Gould with this issue, because they have contact with each other.

So my first contact in this matter, it was by Klara in Sweden.

Q Do you know her full first and last name? And can you spell it for the record?

A I don't have the -- the name in my memory maybe. Just Klara, and he -- she have his (sic) own law bureau, I think.

Q In Sweden?

A Yes, in Stockholm.

Q Do you know why they wanted to help Merchant & Gould?

MR. LEACH: Object to form.

A No.

Q (By Mr. Yackey, continuing) Is this -- and I'm probably

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getting the name wrong. Is it Laura?
A Klara, K-l-r -- a-r-a.
Q All right.
A Klara.
Q Did you sign an engagement agreement with Klara?
A No.
Q When was your first contact with Merchant & Gould directly?
A Directly it should be maybe by -- first by email -- now it's September. In the middle or the end of July maybe.
Q Of 2024?
A 2024, yes.
Q So when you executed your declaration, had you had any contact with Merchant & Gould?
A No.
Q Did you know why you were signing your declaration in 2023?
A Not really, but -- what the issue was. Plus this, what you say, Arnoldsson who made these documents, just come and say it was something in the U.S., they go to -- to court, and they want to have us verify that these documents are real.

So I don't -- I don't know what it's -- what it's all about really.
Q How much time did you have to review your declaration

after Mr. Arnoldsson gave it to you and when you signed it?

A Yeah, I think a couple of days. I look it through and it seems it was in order, so --

Q And did you have all the exhibits in front of you for review when you signed your declaration?

A Yes.

Q And did you prepare your exhibits to your declaration?

A No.

Q Did Mr. Arnoldsson provide those to you?

A Yes.

Q Do you know where Mr. Arnoldsson got those exhibits to your declaration?

A Yeah, from -- from the company's -- where they store all these things in the computers.

Q So when you were reading your declaration earlier, you were reading what Mr. Arnoldsson gave to you, correct?

A Yes.

MR. LEACH: Object -- object to form.

Q (By Mr. Yackey, continuing) And the exhibits that are attached to your declaration that you read were also given to you by Mr. Arnoldsson, correct?

A Yes.

MR. LEACH: Object to form.

Q (By Mr. Yackey, continuing) Did you -- how did you

receive the copy of your declaration?
A Yeah, he come with all these documents to me and tell me to go through and see if I can sign the declaration.
Q So were they in paper?
A Yes.
Q Did he ever email them to you?
A No.
Q And after you signed them, did you just give them back to him?
A Yes.
Q What else did you and Mr. Arnoldsson talk about with respect to this declaration?
A No, nothing -- nothing more about that. We think that it was -- it was -- it ended with if I clarified that with my sign, okay, that -- that's it.
Q Did you ask him any questions as to why he needed you to sign this declaration?
A No, not especially, not some extra. He -- I don't know how much he knew about all this, but he don't talk about everything about that with me.
Q Have you -- have you signed documents like this in the past?
A No.
Q Is this the first time that you've been asked to sign a declaration like this?

A Yes.
Q And so you -- did you just sign this declaration because Mr. Arnoldsson asked you to?
MR. LEACH: Object to form.
A Yeah, he gave me these documents and asked me could you check if these documents are the same document that we always have used and this is, yeah, up-to-date -- what you say, up-to-date, but it's real documents that we have used. And it is, so no special about that, I think.
Q (By Mr. Yackey, continuing) What did you -- what did you do to confirm that the documents that he gave you as exhibits were what the declaration says they are?
A These documents I have seen many times before in -- in the computer. So I know that these documents came from, what you say, the computer and the company.
So it was no -- no question of doubt for me so -- that it's a real thing, yes.
Q So at the time you signed your declaration, you were still an employee of Truxor; is that correct?
A Yes.
Q So you had access to the company's computer and -- and files?
A Yes.
Q Did you compare them to what was on your servers to

ensure that they were correct and -- and matched what you say was kept in the ordinary course of business?

A Yes. Some of these documents I check on the computer, yes.

Q Some of them?

A Yes.

Q Do you recall which ones?

A No.

Q But not all of them?

A No, not all of them.

Q Did you think it was odd that he was handing you this declaration to sign?

MR. LEACH: Object to form.

A Yeah, because if you can say -- it's odd, because it was the first time for me, yes. That's -- that's odd, yes.

Q (By Mr. Yackey, continuing) And -- and you didn't -- with it being the first time, did you ask him why do you need me to sign this?

A Yeah, because I'm the only person on the -- on the factory that still works and know about the future. Because every -- everybody else who have been there in, what you say, 2009, they have already retired. So it's only me who can tell the truth.

Q So would you say that signing this declaration was part of your job duties at Truxor?

MR. LEACH: Object to form.

A I don't know if you can say it was my job. But for this moment, I was the only one -- only person in the factory that could clarify that.

Because Mr. Arnoldsson, he haven't -- haven't been working for Dorotea Mekaniska for maybe four or five years. So he -- he don't know if it's fact was real, that's why he ask me to clarify that it was the right document.

Q (By Mr. Yackey, continuing) So he -- so he wrote your declaration?

MR. LEACH: Object to form.

Q (By Mr. Yackey, continuing) You -- I believe you testified that Mr. Arnoldsson wrote your declaration; is that correct?

A Yeah.

MR. LEACH: Object to form.

A Yeah, he -- he wrote the document and I read it and check with the following documents and then I signature.

Q (By Mr. Yackey, continuing) But, yeah, I believe you testified Mr. Arnoldsson has only been with the company for four years at the most?

A Yes.

MR. LEACH: Object to form.

Q (By Mr. Yackey, continuing) Is that correct?

A Yes.
Q So how did he know what to write about prior to his arrival at the company?
A Yeah, because he have been -- when he start working, he was informed of, yeah, the history and all -- how it looks. And -- and he can also go into the computer and see what -- what paper was needed, documents.
Q So who -- who informed him of that?
MR. LEACH: Object to form.
A I think it was the -- the former owner of the company.
Q (By Mr. Yackey, continuing) And what was that person's name again?
A Torbj rn Hallin.
Q Did Arnoldsson work with Merchant & Gould to write this declaration -- sorry, to write your declaration?
A No --
MR. LEACH: Object to form.
A -- I don't -- I don't think so.
Q (By Mr. Yackey, continuing) So Mr. Arnoldsson drafted your declaration on his own?
MR. LEACH: Object to form --
A Yes.
MR. LEACH: -- misstates the testimony.
Q (By Mr. Yackey, continuing) Is it your understanding that Mr. Arnoldsson wrote your declaration?

A Yes.
Q Is it your understanding that Mr. Arnoldsson alone wrote your declaration?
MR. LEACH: Object to form, foundation.
A I don't -- I don't really know if he -- he alone wrote it. But he gave the paper to me, so I assume it was him who have -- make the paper.
MR. LEACH: Scott, it's 5:03.
MR. YACKEY: Yes.
MR. LEACH: How much longer do you have? You know, and -- and for the record, you know, there's been a lot of time where it's taken, you know, 30 seconds to a minute to -- you know, between questions. So you're -- you're not using the time as efficiently as you could be.
MR. YACKEY: Tom, I think you had similar -- similar gaps in your questions. And, frankly, I'm reviewing documents that you produced to us just yesterday afternoon, so I think we've -- we've both been using our time appropriately. Again --
MR. LEACH: How much time do you have left, though?
MR. YACKEY: -- that you would have -- that you were splitting the time equally for this deposition. You've only given us, you know --

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MR. LEACH: Why would you assume that?

MR. YACKEY: -- you know, not nearly the time.

MR. LEACH: You guys didn't even notice up the deposition. We're -- we're providing you a courtesy to ask questions here.

Where are we at on time?

VIDEOGRAPHER: We are at 6 hours and 37 minutes, approximately.

MR. LEACH: How much more do you have left, Scott?

MR. YACKEY: I can't tell you for sure, but let me just continue to ask my questions.

Q (By Mr. Yackey, continuing) Do you have any interest in Truxor?

A No, not now.

Q Not -- did you have an interest in Truxor prior to your retirement?

A Yeah, the interest of -- of being employer (sic) on the company, that's --

Q Did you have any ownership of Truxor?

A No.

Q Today do you have any ownership of Truxor?

A No.

Q You own no shares of Truxor?

A No.

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Q Are you still getting paid by Truxor?
A No.
Q Are there any companies that are related to Truxor?
A No. It's its own company.
Q So no parent company owns Truxor?
A No. It's -- what do you say? It's a consortium who they -- they -- the previous owner sold the company to -- to a consortium that have different -- different, what you say, factories and companies in its -- in its bag, you say.

Lagercrantz is the name of the -- the owner of Dorotea Mekaniska now.

Q Do you have any business ventures or investments with the prior or current owner?
A No.
Q Do you have any business ventures or investments with any of the sister companies?
A No.
Q The defendant in this case is Bazooka Farmstar, LLC. Do you understand that?
A Okay.
Q Do they and Truxor do any business together?
A No. I haven't heard about Bazooka before.
Q When was the first time you heard about Bazooka?
A Yeah, it was now when Klara called me up in June this

year.

Q So you -- you did not know about Bazooka when you executed your declaration?

A No.

Q Have you heard of a company called Eldon C. Stutsman, Inc.?

A No.

Q Have you had any communications with anyone at Eldon C. Stutsman, Inc.?

MR. LEACH: Object to form.

A No. If I don't know who it is, how can I contact them?

Q (By Mr. Yackey, continuing) Have you ever heard of a company called Stutsman Holdings, Inc.?

A No.

Q Have you ever had any communications with Bazooka?

A No.

Q Do you know anyone named Eric Hahn?

A No.

THE COURT REPORTER: Can you spell the last name? And is it Eric with a C or a K?

MR. YACKEY: It's Eric with a C, and it's H-a-h-n, as in November.

Q (By Mr. Yackey, continuing) Do you know anyone by the name of Phil Minino?

A No.

THE COURT REPORTER: Spelling?

MR. YACKEY: I believe it's M as in Mike, I as in India, N as in November, I as in India, N as in November, O as in Oscar.

Q (By Mr. Yackey, continuing) Do you know a Jeffrey Huber?

A No.

MR. YACKEY: And I believe that's H-u-b as in bravo, E as in echo, R as in Roger.

Q (By Mr. Yackey, continuing) How about Matthew Hirsch? Do you know anyone by that name?

A No.

MR. YACKEY: And I believe it's H-i-r-s as in Sierra, C as in Charlie, H as in hotel.

MR. LEACH: Hey, Scott? This seems to be just a fishing expedition now and I do have to go, so -- and you won't tell me how much longer you have. You know, you got to help me out here.

MR. YACKEY: Five -- I mean, we were -- we were expecting to get half the time that -- that you used, Tom.

MR. LEACH: Well, I don't know why that would be. You never noticed up the deposition of Mr. Olofsson. You've had plenty of time to ask your questions. I told you when I had a hard deadline. I'm already 10 minutes past that.

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MR. YACKEY: That's -- that's not my fault, Tom.

MR. LEACH: Scott, how much time do you have left?

MR. YACKEY: Five minutes?

MR. LEACH: Okay. Keep going.

Q (By Mr. Yackey, continuing) Prior to your involvement in this case, have you ever heard of Nuhn Industries, Limited?

A No.

Q All right. And you left Truxor's employment in July of '23 you said, correct?

A Yes.

Q So what's your knowledge of how documents are kept in the ordinary course of business since you've left?

A I suppose in the same direction that we have always done before.

Q What's your basis for that?

A Yeah, I have been the -- for -- to collect these documents, I have been able to go to the factory and sit with my own old computer that I work with and log in and search for all these documents.

So I think -- and I don't see anything different about how it looks now than for maybe four or five years ago.

Q What about in the 2010 through 2013 time frame? Was it -- is it any different now than it was then?
A No. It's the same.
Q Are they stored on a server --
A Yeah.
Q -- somewhere, or were they --
A On a server, yes.
Q And -- and you were still permitted to access that server after you left Truxor?
A Yeah. They -- they save my computer there in the hope of maybe I could come in and help them sometimes, but it hasn't happened until this date. But they hope I make -- I can come and help them sometimes maybe.
Q So were you -- were you a custodian of -- of records while you were an employee at Truxor?
A How you mean?
Q Was it your responsibility to maintain these documents that you referred to in your declaration while you employed at Truxor?
A Yes.

MR. LEACH: Object to form.

A Yes, I have -- yes. My -- the -- all the documents that I have produced I have also the responsibility to keep them, sure, yes.
Q (By Mr. Yackey, continuing) Was there anyone else at

Truxor who shared that responsibility to maintain documents?

A Yeah. Everyone have to control their own documents for sure.

Q Who's the custodian for some of these documents today since you've left?

A I don't understand the custodian. What do you mean?

Q Who -- who is the person responsible for maintaining these business records at Truxor since your departure?

A I don't really know what -- whose person it is now.

Q Do you know who others -- do you know the names of the others that were while you were there?

A Yes.

Q What were some of those names?

A Yeah, we have one at Truxor that's called Johon Olofsson and one who his name is Hampus Paulsson.

THE COURT REPORTER: Can I have you spell the first names, please?

THE WITNESS: H-a-m-p-u-s. J-o-h-o-n.

MR. LEACH: Scott, you've had your five minutes.

MR. YACKEY: Are you cutting me off?

MR. LEACH: No, but it seems like you're just going to keep going so that happens, 'cause you're not really accomplishing anything other than

wasting time. But -- 'cause I know that's what you want me to do, so then you can argue to the Court. But you can keep going.

MR. YACKEY: All right. I've just got a couple more.

Q (By Mr. Yackey, continuing) You said you designed the Doro pump; is that correct?

A Yes.

Q Did you design the Doro pump to pump liquid manure?

A No. It was just designed for pump dredge sediments.

Q Dredge sediment?

A Yes.

Q And earlier I think when I asked you what -- what manure is, I think you said, excuse my French, but shit, right?

A Okay. Yep.

Q Does that to you include human feces?

A Oh, yes, okay.

Q Was that your opinion before your involvement in this case, or -- or did Mr. Leach assist you in that answer?

A No. No. It was my own words, yeah.

MR. LEACH: Yeah, you can answer that. But, also, don't get into any attorney-client communications. But that's fine.

MR. YACKEY: All right. I think I'm -- I think I'm finished.

MR. LEACH: Okay. Thanks, Scott. I just have a few follow-up questions.

RE-EXAMINATION

BY MR. LEACH:

Q Mr. Olofsson, did Truxor file a patent on the Truxor DM 5000? Did you file for a patent protection on your --

A No.

Q -- DM 5000?

A No.

Q Do -- do you know why not?

A Yeah, we had talk about this before. I think the -- the patent is -- it's very weak to -- the paper to say. Anyone else can do the same, but change a little bit and then the patent is no use.

Q Is there any doubt in your mind on the Truxor brochures that are in your deposition exhibit, which is DX 32, for example, Exhibit G, which is BAZ15_0001197 to BAZ_001216, was publicly distributed and publicly available prior to August of 2013?

A Yes.

Q No. Is there any doubt?

A Not any no doubt, no, no, no.

Q You're certain this was publicly available prior to 2013?

A Yes, yes.

MR. LEACH: Okay. I have no further questions.

VIDEOGRAPHER: This concludes --

MR. YACKEY: I just have a couple.

RE-EXAMINATION

BY MR. YACKEY:

Q Who was it that told you that a -- that a patent on the Truxor would be weak?

A Nobody. But it's so easy for someone who will -- will duplicate just to maybe change one thing and then it's -- as we -- as we speak, we think it would be way hard to contain this patent. So it was -- it's too expensive also, so --

Q Did you ever at least apply for a patent?

A No.

MR. LEACH: Okay, Scott.

Q (By Mr. Yackey, continuing) Did you believe or do you believe the Truxor was something that could be patented?

A I've seen it very difficult to get a patent on that.

MR. LEACH: Okay, Scott. I got to go.

MR. YACKEY: No further questions.

MR. LEACH: Thank you.

VIDEOGRAPHER: This concludes the deposition of Reidar Olofsson. The time is approximately

5:22 p.m. We're now off the record.

MR. LEACH: We'll read and sign.

(The video deposition of Reidar Olofsson came to a close at approximately 5:22 p.m.)

STATE OF MINNESOTA)
COUNTY OF DAKOTA)

Be it known that I took the video deposition of Reidar Olofsson on the 5th day of September, 2024 at Minneapolis, Minnesota;

that I was then and there a Notary Public in and for the County of Dakota, State of Minnesota, and that by virtue thereof I was authorized to administer an oath;

that the witness, before testifying, was by me first duly sworn to testify to the whole truth and nothing but the truth relative to said cause;

that the testimony of said witness was recorded in stenotype by myself and reduced to print by means of Computer-Assisted Transcription under my direction, and that the deposition is a true record of the testimony given by the witness to the best of my ability;

that I am not related to any parties hereto nor interested in the outcome of the action.

Dated this 13th day of September, 2024.



Shannon Caflisch

Shannon Caflisch, RPR
Notary Public,
Dakota County, Minnesota
My Commission expires 1-31-2025

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

September 17, 2024

To: Scott Yackey, Esq.

Case Name: Nuhn Industries LTD v. Bazooka Farmstar LLC

Veritext Reference Number: 6885167

Witness: Reidar Olofsson Deposition Date: 9/5/2024

Dear Sir/Madam:

Enclosed please find a deposition transcript. Please have the witness review the transcript and note any changes or corrections on the included errata sheet, indicating the page, line number, change, and the reason for the change. Have the witness' signature notarized and forward the completed page(s) back to us at the Production address shown above, or email to production-midwest@veritext.com.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department

NO NOTARY REQUIRED IN CA

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6885167
CASE NAME: Nuhn Industries LTD v. Bazooka Farmstar LLC
DATE OF DEPOSITION: 9/5/2024
WITNESS' NAME: Reidar Olofsson

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have made no changes to the testimony as transcribed by the court reporter.

_____ _____

Date Reidar Olofsson

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal

this _____ day of_____, 20____.

_____
Notary Public

_____
Commission Expiration Date

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6885167
CASE NAME: Nuhn Industries LTD v. Bazooka Farmstar LLC
DATE OF DEPOSITION: 9/5/2024
WITNESS' NAME: Reidar Olofsson

In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me.

I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s).

I request that these changes be entered as part of the record of my testimony.

I have executed the Errata Sheet, as well as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein.

_____ _____
Date Reidar Olofsson

Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that:

They have read the transcript;
They have listed all of their corrections in the appended Errata Sheet;
They signed the foregoing Sworn Statement; and
Their execution of this Statement is of their free act and deed.

I have affixed my name and official seal this _____ day of_____, 20____.

_____
Notary Public

_____
Commission Expiration Date

ERRATA SHEET

VERITEXT LEGAL SOLUTIONS MIDWEST

ASSIGNMENT NO: 6885167

PAGE/LINE(S) / CHANGE /REASON

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Date Reidar Olofsson

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DAY OF _____, 20_____ .

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Notary Public

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Commission Expiration Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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